

Summary	Detailed Privacy Policy
1. About Roblox and this Privacy Policy	
<p>Roblox values your trust, so we want to tell you about the personal information we collect from you when you use our websites and app, how we use it, and who we share it with. That’s why we’ve created this privacy policy to keep you informed.</p> <p>Roblox is a global company, and this policy is for everyone around the world. Roblox has to follow laws designed to protect personal information in the different countries where our users live. For example, the Children’s Online Privacy Protection Act (“COPPA”) in the US, the General Data Protection Regulation (“GDPR”) in the EU and the UK, and the Brazilian General Data Protection Law (“LGPD”) in Brazil apply to Roblox.</p> <p>The laws in these countries give children (meaning users under the age of 13 for COPPA, for example) data protection rights. More information about these special rights are in the “<u>Your Privacy Rights</u>” sections below. You can also see the “<u>Children’s Privacy and Parental Controls</u>” section for more information about your rights as a parent or legal guardian of our children users and the measures we take to afford children users with additional protections and comply with applicable data protection legislation, depending on where you are located.</p> <p>You can learn more about COPPA, by looking at this simple guide from the kidSAFE Seal Program – www.kidsafeseal.com/knowaboutcoppa.html.</p> <p>If you or your parent or guardian have questions about this policy or how we</p>	<p>Your privacy is important to us. In order to help you understand our privacy practices, we created this Privacy Policy so that you are aware of what information we collect, how we use it, and who we share it with.</p> <p>This Policy covers our websites on the roblox.com domain, our Roblox mobile, virtual reality and Xbox apps, the Roblox Player, the Roblox Studio, and our other websites, products, software, applications, content, data feeds and other services on which an authorized link to this Policy is posted. This Policy covers our practices regarding Roblox users of all ages, including a unique set of practices for those under the age of 13. The Service is operated by or on behalf of Roblox Corporation.</p> <p>Roblox is also committed to protecting the privacy of our users, including children. Please see the “<u>Children’s Privacy and Parental Controls</u>” section below for more information about your rights as a parent or legal guardian of our children users and the measures we take to afford children users with additional protections and comply with applicable data protection legislation, depending on where you are located, such as the Children’s Online Privacy Protection Act (“COPPA”), the General Data Protection Regulation (“GDPR”) and the Brazilian General Data Protection Law (“LGPD”).</p> <p>To learn more about COPPA, you may consult this simple one-page informational guide from the kidSAFE Seal Program – www.kidsafeseal.com/knowaboutcoppa.html.</p> <p>If you have any questions, comments, or concerns regarding this Privacy Policy and/or our data practices, please contact us at the following support form, telephone number, or mailing address:</p> <p><u>Customer Support Form</u></p> <p>(888) 858 - BLOX Roblox Corporation Attn: Roblox Privacy Manager</p>

<p>use your personal information, you can contact us by completing this Customer Support Form.</p> <p>Alternatively, you can email our GDPR representative if you are in the European Economic Area, the United Kingdom, or Switzerland or by telephoning or writing to the Roblox office in California or our office for the EEA or the UK.</p> <p>Customer Support Form</p> <p>(888) 858 - BLOX Roblox Corporation Attn: Roblox Privacy Manager Address: 970 Park Place, Suite 100 San Mateo, California, 94403 privacy@roblox.com</p> <p>Email our GDPR representative at: roblox@gdpr-rep.com</p> <p>EEA: Tel: +49 (0) 40 99999 - 3430 DP-Dock GmbH Attn: Roblox Corporation Ballindamm 39 / Ecke Jungfernstieg 20095 Hamburg, Germany</p> <p>UK: DP Data Protection Services UK Ltd. Attn: Roblox Corporation 16 Great Queen Street Covent Garden, London, WC2B 5AH, United Kingdom</p> <p>If you are a user based in Brazil, you may contact our Brazilian Data Protection Officer regarding your personal data by emailing us at privacy@roblox.com.</p>	<p>Address: 970 Park Place, Suite 100 San Mateo, California, 94403</p> <p>For users based in the European Economic Area (EEA), the United Kingdom, or Switzerland:</p> <p>If you are a user based in the European Economic Area, the United Kingdom, or Switzerland, you may also contact our Representative according to Articles 27 EU and UK GDPR in the European Union:</p> <p>roblox@gdpr-rep.com</p> <p>EEA: Tel: +49 (0) 40 99999 - 3430 DP-Dock GmbH Attn: Roblox Corporation Ballindamm 39 / Ecke Jungfernstieg 20095 Hamburg, Germany</p> <p>UK: DP Data Protection Services UK Ltd. Attn: Roblox Corporation 16 Great Queen Street Covent Garden, London, WC2B 5AH, United Kingdom</p> <p>If you are a user based in Brazil, you may contact our Brazilian Data Protection Officer regarding your personal data by emailing us at privacy@roblox.com.</p>
<p>2. Definitions</p>	
	<p>For the purposes of our services, the definitions are as follows:</p>

	<p>“Children” or “Child” means any user under the age of 13.</p> <p>“Personal Information” means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.</p> <p>“Platform” means our Roblox platform, the ultimate virtual universe where imagination rules.</p> <p>“Privacy Policy” or “Policy” means this Roblox Privacy Policy.</p> <p>“Processing” means any operation which is performed on Personal Information, such as collection, recording, organization, structuring, storage, adaptation or any kind of disclosure or other use.</p> <p>“Service” means any service or application offered by Roblox, such as allowing users to develop Platform experiences, connect with others, and use content created by you and other users.</p> <p>Any other capitalized term that is not defined in this Policy is defined and has the meaning set out in our Terms of Use.</p>
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3. Information Collected on our Corporate Websites

<p>We have a number of corporate websites, such as corp.roblox.com and blog.roblox.com. These sites explain our technology and who works at Roblox. There is news on there about the company and we let people know about job openings that they can apply for at Roblox. There is also information on there <u>for parents</u> in the resources section. While these websites are generally aimed at adults, you can also visit them to learn more about Roblox as a company.</p> <p>We only collect information from people on these websites when someone is applying for a job or interested in partnering with Roblox.</p>	<p>Please note that our corporate websites (which may include corp.roblox.com, blog.roblox.com, and their subdomains) are general audience websites. On these sites, we may provide information regarding the corporate side of Roblox, press information, career information, and other general audience information. We may also ask for your name, email address, employment details if you send us a CV, resume or other details of your employment history in connection with an advertised job vacancy or a general inquiry regarding employment opportunities with us and other information so that we can provide corporate-related information to you or respond to your job application. We may also ask for your name, email address, company information, and other details in connection with your business to fulfill your request for updates or materials from us. No experiences are available on the corporate websites. As such, the parts of this Privacy</p>
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	<p>Policy that discuss experiences or discuss children are not applicable to the corporate websites.</p>
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4. Information You Provide when Setting Up an Account on Roblox

<p>Everyone on Roblox has to create an account in order to participate in our experiences.</p> <p>When you create a Roblox account, we will ask you to choose a unique username and password (so that you can log into your account).</p> <p>We will also ask you for your date of birth, your gender, the country you live in and which language you speak.</p> <p>You must not create a username that includes your real name. It is also important to create a password that is not easy to guess. You may share your password with your parent(s) or legal guardian, but never share it with anyone else, not even your friends.</p> <p>You can also add an email address to your account in case you cannot remember your password and need to reset it.</p>	<p>All users must create a Roblox account to join any experiences. To create a Roblox account, we will ask you to create a unique username and password (so you can log into your account) and to provide other demographic information, such as your age or date of birth, gender, regional location or language preference (so we can customize your experience on Roblox).</p> <p>Users are strongly encouraged not to create a username that reflects their own name or other Personal Information. Users should also not pick a password that is easy to guess, and should not share their password.</p> <p>Usernames are used for participating in Service features, and we do not use them to identify individual users outside of their activities on our Service. Usernames are shared with the parties listed in Section 7 below.</p> <p>Users may be asked to provide or may choose to add an email address to their account for added verification and/or to enable certain features. The primary purpose for this email address is to provide account security, since this is the only way for Roblox to check the authenticity of an account owner. In this circumstance, children are asked to provide a parent email address. Users may change the email address associated with their account at any time; however, a notification will be sent to the previously provided email address upon making that change.</p>
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5. Additional Personal Information We Collect When You Use Roblox Features

<p>You don't have to share any additional personal information with us (other than the information described above) to use our websites or app. We may collect other personal information when you use our platform, for example, if you or your parents buy Robux, we will collect additional information from the buyer in order to take the payment such as your name, billing address, email address and</p>	<p>In addition to account setup on Roblox, we may collect and process Personal Information from you directly if you use the following features and activities (as applicable):</p> <ul style="list-style-type: none"> • <u>When you make purchases on the Service.</u> Users can purchase virtual currency or premium subscriptions, for example, in the form of Robux, Premium memberships, etc., and may use a variety of payment methods.
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payment card details or other payment information.

When you use voice chat or type content on Roblox in public chat, private chat, forums, group walls, personal posts or portfolios, we will monitor what you say and write to check that it does not contain inappropriate content, your personal information, or chat that is not suitable for users to have on Roblox.

If you contact us, for example, about a problem with our services, we may collect your contact information, such as your email address and other important information about your issue or concern. We will only use this information to solve your problem/concerns and to be able to reply to you.

When you browse and use our websites and app we might collect information about your actions on the website and app to make your experience better. For example, we might look at your search history and suggest other games that are similar.

We might also collect information from your device when you visit our websites, as outlined in the “Cookies and Similar Technologies” section.

If you or your parent(s) want more information about the additional personal information we may collect, it can be found in the detailed section of our full privacy policy.

Any information that you give to us or that we collect might be used to:

- keep the website and/or app running and to improve it;
- give you access to the website or app and additional features, or to restrict your access;
- make the content on the website or app personalized to you and make it easier for you to use;

When making purchases, users or their parents will be required to enter billing information, which may include name, billing address, credit card or other payment information, and billing email. Our payment processors will process all purchases, and you will be subject to their terms and conditions and privacy policy. Your billing information, transaction details, and purchase history may be retained and used by our payment processors to resolve subsequent billing disputes and inquiries.

- When you post, share, or otherwise transmit comments, messages, or content on Roblox via community features, such as public chat or private chat, forums, group walls, personal posts, portfolios, etc. We may collect these comments, messages, posts, and they may be monitored, filtered and moderated for purposes such as removal of profanity, Personal Information, and other inappropriate content. Where permitted by law, we may use pre-filtered chat, comments and messages for purposes such as training and improving our filter technology to increase the safety on our platform.
- When you participate in our Roblox Developer Exchange Program. We require you to provide us with an IRS W-9 form (for U.S. taxpayers) or W-8 form (for non-U.S. taxpayers). We may also ask you to verify your identity by providing a government issued photo ID through a third-party vendor. For more information on the Developer Exchange program, please visit our Developer Exchange Terms of Use.
- When you provide us with your phone number. If you choose to provide a phone number for verification, you may receive a verification SMS after sign-up to confirm your ownership of the number, which will allow you to log in via mobile. Your phone number may also be used to recover a lost or forgotten password. Additionally, with your explicit and informed consent, we may use your phone number to recommend you as a friend to others using Roblox. You will be recommended with your contact name as stored on your friends' devices, which may include also your real name. If you do not want us to use your phone number to be found by your friends on Roblox, please do not activate this feature or deactivate it at any

- help you look after your Roblox account, like changing your account settings, and pay for Robux;
- detect security incidents and protect against bad or illegal activity, and find those responsible for that activity; and
- protect your safety.

If your parents want more detail about this, they can view our full privacy policy.

time. Please note that the Discoverability feature may not be available in certain locations.

- When you provide us with your contact book. If you opt-in to the Contact Importer feature, you consent to sharing with Roblox the first and last names and phone numbers of your contacts in your address book on your mobile phone, either at the time you register for our Service or otherwise. We do so to help you connect with your friends on our Service. As part of the Contact Importer feature, we will automatically access and collect information in your address book from time to time in order to sync your contacts. Such information will only be retained in case of matches with existing Roblox users. However, our Contact Importer feature may not be available in certain locations.
- When you join our experiences on a VR platform. If you join our experiences on a VR platform, we will collect your physical movement information in order to replicate your movement in the experience. This information is only used to provide the Service and is not stored.
- When you contact or send communications to us. For example, when you contact customer support, report a problem, or submit questions, concerns, or comments regarding our Service or its content, we may collect contact information such as your email address and other important information about your inquiry or concern. This information is used to respond to your communications, fulfill your requests, or provide other customer support.
- When you use or interact with third-party plug-ins that may be available on the Service for users other than children. This includes third-party social media widgets, share buttons, and/or login mechanisms. These features may include social plugins from Google, Facebook, Twitter or other platforms, and may be subject to the terms and conditions and/or privacy policies of these other companies as posted on their respective websites. When you use these features, certain information from your social media accounts may be accessed by or shared with Roblox, and likewise, certain information about your use of Roblox may be posted to your profile on those platforms.

- When you participate in contests, competitions, sweepstakes, giveaways, prize draws or other promotions that we may run or sponsor on our Service. These promotions may involve the collection and use of certain contact information (such as your name, email address, and/or phone number) for prize fulfillment purposes, as well as other information or content needed for the specific promotion. In some jurisdictions, we are required to publicly share information about the winners.
- When you respond to or participate in voluntary research or demographic surveys or studies. These surveys may collect information about your likes and dislikes, experience interests and habits, general hobbies and interests, and other lifestyle information or preferences. These surveys may ask for Personal Information.
- When you request or agree to voice based services from Roblox. With your consent, we may collect, process and store your voice recording to provide services and to increase the safety of our voice related services. We may use your voice recording for purposes such as training and improving our filter technology to increase the safety on our platform, except that we will not engage in these activities with private server voice chat recordings of EEA users.
- When you request or agree to location-based services from Roblox, which may be available to our users other than children. With your consent, we may collect or track real-time or precise geolocation information to provide services such as tagging, check-in and content delivery, or geo-based advertising, or other services that are dependent on knowing where you are. This information may be collected in combination with an identifier associated with your device to enable us to recognize your mobile browser or device when you return to the Service. You can always stop the collection of location information by updating your device settings, stopping the use of the Service, or uninstalling our mobile applications.
- When you subscribe to other features or activities, which may be available to our users other than children. We may offer other features or activities on our Services from time to time, and you may be able to submit or

upload Personal Information in connection with such features. The data being collected for such features and their intended uses will be evident at the time of data collection.

- When you browse, navigate, or otherwise interact with the Service. We collect information about your interactions with the Service and connect the information collected with your account to provide you a better user experience. For example, we may collect information from your search history to provide you with similar recommendations. We may also collect information from your device when you visit our websites, as outlined in the “Cookies and Similar Technologies” section below.
- Information processed to enable advertising. To market our services, inter alia, via social media platforms in order to bring new users to our websites and to maintain and increase our user base, we may process Personal Information such as IP addresses, information on users’ browsers or operating systems, including language settings, location information and user names or user IDs.

You are under no obligation to provide Personal Information to Roblox when requested. However, if you choose to withhold any requested information, we may not be able to provide you with certain services and features.

In addition to the specific uses above, any information that you provide or that we collect on the Service may be generally used for the following purposes:

- To operate, maintain, and improve the Service;
- To give you access to the Service and related features, or restrict your access;
- To personalize the Service or content on the Service, as well as make it more user-friendly;
- To allow you to manage your Roblox account or account information, update your account settings, and (where applicable) make purchases or subscribe to services;
- To communicate with you about the Service (product changes, feature updates, etc.);
- To provide technical support or customer service;
- To deliver advertising for our Services that may be relevant to your interests;

	<ul style="list-style-type: none"> • To detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and prosecute those responsible for that activity; • To research technological development and demonstration; • To identify and repair errors that impair existing intended functionality; • To audit interactions, transactions, and other compliance activities; and • To protect the integrity, safety, or security of the Service or our users, comply with legal obligations, or enforce compliance with our Terms of Use, or other restrictions placed on your use of the Service.
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6. Cookies and Similar Technologies

<p>We use tracking technology (such as "Cookies") on our websites and app to help us understand and improve our service, as well as to understand your preferences. A Cookie allows us to remember your actions and preferences on the website (such as your login details, your language settings and your font size preference) over a period of time so you don't have to re-enter them whenever you come back to the website or browse from one page to another. We will also remember your favourite games and friends.</p> <p>If your parents or guardians want more information about Cookies and similar tracking technology, they can view our full privacy policy.</p>	<p>Like most websites, we use cookies and other standard internet technologies to help us improve our Service.</p> <p><i>Cookies</i></p> <p>A cookie is a small text file that is placed on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, for example so you don't have to re-enter them whenever you come back to the website or browse from one page to another.</p> <p>A cookie can be classified by its lifespan and the domain to which it belongs. By lifespan, a cookie is either a:</p> <ul style="list-style-type: none"> • Session cookie which is erased when the user closes the browser; or • Persistent cookie which remains on the user's computer/device for a pre-defined period of time. <p>As for the domain to which it belongs, there are either:</p> <ul style="list-style-type: none"> • First-party cookies which are set by the web server of the visited page and share the same domain (in this case roblox.com domain); or • Third-party cookies stored by a different domain to the visited page's domain. This can happen when the
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webpage references a file, such as JavaScript, located outside its domain

Pixel Tags/Web Beacons

A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about visitors' engagement on that web page. The use of a pixel allows us to record, for example, that a visitor has visited a particular web page or clicked on a particular advertisement.

How we use cookies

When you visit or access the Service, we may – by means of cookies, beacons, tags, scripts, and/or other similar technologies – automatically collect technical information about the devices and software you use to access the Service, such as the type of Internet browser or mobile device you use, the website or source that linked or referred you to the Service, your IP address or device ID (or other persistent identifier that uniquely identifies your computer or mobile device on the Internet), the operating system of your computer or mobile device, and other similar technical information. These same technologies (or a combination of them) may also be used to help us:

- Capture and store users' preferences, account settings, and certain login information (for convenience, user verification, and account security);
- Compile statistics and analytics about your use of and interaction with the Service, including details about how and where our Service is downloaded from or accessed, how often a user visits or uses the Service, the date and time of user visits to, and actions on, the Service, which areas of the Service are visited and for how long, information regarding in-game activities, and other similar traffic, usage, and trend data;
- Mobile analytic tools to allow us to better understand the functionality of our mobile software on your device and gain insights about how mobile software is used;
- Gather important functionality, testing, and performance data about our Service, including performance data related to our mobile application, the Roblox Player, and Roblox Studio, such as networking activity, CPU load, and resource usage, among other relevant data;
- Moderate user behavior on the Service, such as protecting against payment fraud and other inappropriate activities;

- Gather demographic information about our user base; and;
- Perform other similar functions.

We will not use cookies or similar technologies other than for the purposes stated in this Privacy Policy.

Third party advertising and ad networks

Roblox partners with third-party advertisers, ad server companies, and ad networks (“third-party advertising companies”) to promote our Service. If you respond to one of our advertisements and visit or register to use our Service, we or our service providers may provide these third-party advertising companies with identifiers from your device or computer, such as an IP address or device ID, to help us analyze our user acquisition efforts.

For our users that are children, Roblox partners with third-party advertising companies to serve contextual advertising, cap the frequency of advertising, and provide related uses permitted by COPPA. Roblox does not show behaviorally targeted or retargeted ads to children or track such users for the purposes of directing targeted advertising.

NOTE: In order to disable advertising-related tracking at your request, companies may need to set an opt-out cookie on your browser. Sometimes a browser’s configuration may prevent companies from setting such cookies, for example, if your browser is set to block all third-party cookies by default. Therefore, you may need to change your browser settings to accept cookies, in order to fully disable advertising-related tracking.

Your choices

For Roblox.com, please click on the link in the footer at the bottom of the page to access your cookie options. .

For all other sites, please clear your cookies and refresh your browser to display the cookie banner to access its settings.

Most web and mobile device browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set.

	<p>Some browser manufacturers provide comprehensive help relating to cookie management in their products. Please see below for more information:</p> <ul style="list-style-type: none"> • Google Chrome: https://support.google.com/chrome/answer/95647?hl=en-GB, • Internet Explorer: https://support.microsoft.com/en-us/help/260971/description-of-cookies, • Mozilla Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer, • Safari (Desktop): https://support.apple.com/kb/PH5042?locale=en_US, • Safari (Mobile): https://support.apple.com/en-us/HT201265, • Android Browser: https://support.google.com/nexus/answer/54068?visit_id=0-636612941590933601-131731679&hl=en&rd=1, and • Opera: https://www.opera.com/help. <p>You can also learn more about cookies by visiting https://www.allaboutcookies.org/, which includes additional useful information on cookies and how to block or delete cookies that are already on your computer.</p> <p>Please note, however, that by blocking or deleting cookies used on the Service, you may not be able to take full advantage of the Service and you may not be able to log on to the Service or play the Roblox games.</p>
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7. Information Sharing

<p>Roblox doesn't sell your information to other companies for them to use as they want.</p> <p>Roblox does have relationships with some companies that help us provide our services (for example, when you or your parent purchase Robux), so we may provide some of your information to</p>	<p>Please note that Roblox has not and does not sell Personal Information about you to third-party companies for their independent purposes. Roblox may disclose your information for a business purpose as set forth below.</p> <p><i>Service Providers</i></p> <p>Roblox may share users' information, including Personal Information which includes but is not limited to billing information or usernames, with our third-party</p>
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them, but only because we need to in order to complete your transaction.

We also hire other people and companies to perform services for us. A list of some of the companies we may use to perform these functions can be found in the detailed version of our privacy policy. The other companies are only allowed to use the personal information we share with them to complete tasks that we hire them to do. They are not allowed to sell your personal information or use it for their own purposes.

Public forums and community areas

There are some areas on Roblox such as in game chat where you can communicate with other Roblox users. These are public places and anything you share in these areas is available to other Roblox users who can access the same places. You should remember this before you post any information in these public areas. As you know, Roblox wants to create a safe space for all its users, so we do not allow you to share any personal information about yourself such as your name, where you live, or your email address.

Creators

We share your username, display name, game metrics, location and user ID with the creators of the experiences you access.

Legal disclosures, business transfers, and other important content

If you or your parents or guardians want details about our legal disclosures, business transfers and other important content, they can view our full privacy policy.

agents, contractors, or service providers who are hired to perform services on Roblox's behalf. These providers may operate or support certain functions of the Service. Below is an illustrative list of functions for which we may use third-party service providers, and the names of the providers we may use to perform these functions:

- a. Account Integrity and Security (e.g., Veriff, Arkose Labs);
- b. Analytics services (e.g., Google LLC);
- c. User Acquisition services (e.g., AppsFlyer);
- d. Community filtering and moderation services (e.g., CommunitySift);
- e. Customer support services (e.g., Zendesk);
- f. Surveys and promotions (e.g., Reach3);
- g. Social Media Log-in (e.g., SAP Customer Data Cloud);
- h. Billing services and payment gateway providers (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Xsolla); and
- i. Hosting and content delivery network services (e.g., AWS, Equinix, CenturyLink, YouTube, Vimeo).

These third party service providers are only allowed to use the Personal Information shared with them for the specific tasks they've been hired to do and consistent with this Privacy Policy, and for no other purposes. They are not permitted to sell the Personal Information shared with them. Roblox takes steps to ensure that all service providers with access to Personal Information are capable of protecting the information we share with them.

Public forums and community areas

We offer users the ability to use forums and similar means of public discussion. If you use any messaging, posting, or chat functions on Roblox, you should be aware that any Personal Information submitted there will be available to anyone who has access to that content, including other users. This information can be read, collected, or used by other users of these forums, and it could be used to send unsolicited messages. We are not responsible for how other individuals use the information posted in this manner.

Creators

The creators of the experiences you access will be provided your username, display name, game metrics, user ID, and the regional location you are based in. The information shall enable the creators to determine their player base, so they can adjust their experiences to the legal requirements of the respective regional location. We offer creators a tool which allows them to review the regional location of origin of players who play their experiences. For this purpose, we will determine the user's regional location of access to the Roblox website based on the IP address. We will not share your IP address with the creators.

Legal disclosures

We may disclose Personal Information about you as required or permitted by law and/or comply with a judicial proceeding, court order, or legal process served on our Service. To the extent permitted by applicable law, we also may disclose Personal Information about you in response to a request from law enforcement agencies, regulators, or other public agencies (including schools or children services), or if we believe in good faith that such disclosure may prevent a crime, facilitate an investigation related to public safety or protect the safety of a child using our Service, protect the security or integrity of our Service, or enable us to take precautions against liability or to protect our rights.

Business transfers

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. Where required by applicable law, you will be informed of such disclosure and your consent obtained.

De-identified information

We share aggregated, automatically-collected, or otherwise de-identified information with third parties for various purposes, including (i) compliance with reporting obligations; (ii) for business or marketing purposes; (iii) to assist us and other parties in

	<p>understanding our users' interests, habits and usage patterns for certain programs, content, services, advertisements, promotions and/or functionality available through the Services.</p> <p><i>Do Not Track</i></p> <p>Roblox does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.</p>
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8. Security and Data Retention

<p>The security of your information is important to us. We have measures in place to protect it against loss, misuse, or tampering. However, no security measures are 100% effective, so we cannot guarantee against these risks.</p> <p><i>How long do we keep your information for?</i></p> <p>We will only keep your information for as long as we need to.</p> <p>For more information, please review the detailed version of our full privacy policy.</p>	<p><i>Security</i></p> <p>The security of your Personal Information is important to us. We have security measures in place to attempt to protect the personal or other sensitive information submitted to us against the loss, misuse and alteration of Personal Information under our control. While we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use reasonable efforts to prevent it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.</p> <p>When using the Services or providing Personal Information to us, we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of an incident that may qualify as a breach under applicable law, we will notify you consistent with applicable laws.</p> <p><i>Retention</i></p> <p>Roblox may retain users' account data internally for the following purposes:</p> <ul style="list-style-type: none"> • Billing information and transaction histories are retained to resolve subsequent billing disputes and inquiries; • Publicly shared content and virtual items are retained for use by the community (e.g., a user-created virtual shirt sold to another user is kept in the system because the recipient now "owns" a copy of that item);
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	<ul style="list-style-type: none"> • User account history is retained to support subsequent customer service inquiries and to provide, improve and develop the Service; • To promote safety and security on the Service; and • To resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with our legal obligations. <p>We may retain your information for as long as is necessary for the purposes identified above, which may include retaining your information beyond the end of your use of the Service.</p>
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9. External links

<p>Sometimes you may find a link to another company's website on our website or app. We aren't responsible for that company's privacy policies or content. If you are being directed to another site, we may display a warning message to give you a heads up.</p>	<p>Our Service may, from time to time, contain links to external sites or applications. We are not responsible for the privacy policies or the content of such sites or applications. To make clear when you are linking to a third-party site or application, we may display a warning message informing you when you are leaving our Service.</p>
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10. Children's Privacy and Parental Controls

<p>As a user you are entitled to additional protections for your information and privacy online. When you register an account with Roblox, we make sure your account is set to a restrictive mode, which means that you won't have access to certain features, such as social media links, if you are not 13 or over and your text filtering will be restricted. These additional measures are in place to keep you as safe as possible online.</p> <p>If your parent or guardian's email address is provided to us when you create an account on Roblox, we may share information about your account with them by email. We can also invite your parent or guardian to review or update settings and approve your account.</p> <p>If you or your parents or guardian would like more information about the restrictive</p>	<p>Children are entitled to added protections with regard to their Personal Information and privacy online. For this reason, when children register for the Service, their account is automatically set to a more restrictive mode. This means that child users will not have access to certain features, such as social media plug-ins, some forms of third-party advertising, and certain types of notification alerts.</p> <p>When a child creates an account on Roblox, we may collect a username, password, birthdate, and parent's email address. This information is used to give the child access to the Service (with certain default settings) and, if a parent's email is provided, to communicate with the parent about the child's account. For example, we may use the parent's email to send an email notification about the child's account creation and an invitation for the parent to review, update settings, and approve of their child's account. We may use the birthdate the child provides when signing up for the Service to determine which features on Roblox the child should have access to, and to determine when</p>
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account mode, or parental controls available to them, please review our full privacy policy.

If you are a parent and need to make changes to your child's account, you can contact us by completing this [Customer Support Form](#).

the child will be given broader access to features on our Service. In general, we will not use or share account information (including Personal Information) from your child's account, except as permitted under the applicable laws.

We may share aggregated or otherwise de-identified information of a child (which is information that cannot be used to identify such child) with third parties for various purposes such as: (i) compliance with reporting obligations; (ii) business or marketing purposes; or (iii) to assist us and other parties in understanding our users' interests, habits and usage patterns for certain programs, content, services, advertisements, promotions and/or functionality available through the Services.

To make any requests for changes to your child's account or requests for the removal of Personal Information collected about you or your child from our Service (as applicable), or to request that we stop the further collection or use of your or your child's Personal Information in connection with the Service (as applicable), please complete the Customer Support Form.

We offer all accounts, including children's accounts, the ability to modify chat/communication settings (for example, limiting interaction to just friends or no one), as well as a special "Restricted Account Mode" which turns off all forms of chat and public commenting and which allows the user to access only a selection of filtered experiences on Roblox. We recommend that parents familiarize themselves with all of the safety features and parental controls available in the Settings area of the Service (a description of which can be found [here](#)) and to accompany their children when they are playing online.

We proactively filter all public and comment areas of the Service (such as chat, forums, group walls, personal posts, etc.) to remove references to addresses, emails, phone numbers, or other Personal Information regardless of security and privacy settings. All text is also filtered for profanity, phishing, and adult or suggestive content. Our system uses a combination of human and automated processes. However, like all filtering technology, our systems are not 100% effective.

	<p>If you are a child, it is a good idea to talk to and ask your parent(s) or guardian(s) for permission before using or playing on the Service. If you do not get such permission, you should not use our Service.</p> <p>If we become aware that a child has provided us with Personal Information, we will delete any Personal Information we have collected, unless we have a legal obligation to keep it, and terminate the child's account and/or revert them to the underage experience, as applicable.</p>
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11. Accessing and Updating Your Personal Information

<p>If you want to fix any of your personal information, or if you want us to delete your personal information, you can contact us by completing this Customer Support Form.</p> <p>We will get back to you within a reasonable timeframe.</p>	<p>If Personal Information about you changes, or if you no longer desire to use our Service, you may correct, update, amend, or deactivate your account under your account settings or by contacting Roblox using the Personal Information set out above in Sec. 1. We will respond to your request within a reasonable timeframe. For children under the age of 13, please see the "Children's Privacy and Parental Controls" section above. See Sections 13, 14 and 15 for additional rights available to California, UK, Swiss and European Economic Area, and Brazil residents.</p>
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12. Storage and International Transfer of Your Personal Information

<p>Roblox stores your information in the United States.</p> <p>The privacy laws of the United States may not be as strict as those in your country (especially if you live in the EU or the UK), but we always take reasonable steps to protect your information and your privacy rights.</p>	<p>Roblox is based in the U.S. The Personal Information we collect from you is sent to and stored on secure servers located in the United States of America. Such storage is necessary in order to process the information.</p> <p>Roblox operates globally and we may transfer the personal data information that we collect from you to our other offices and/or to the third parties mentioned in the circumstances described above (see "Information Sharing"), which may be situated outside of your regional location or regional area, and may be processed by staff operating outside your regional location or regional area. In particular, information provided to us or collected by us will likely be transferred to and processed in the United States by us or our agents and contractors. The data protection laws of the United States or other countries may not be</p>
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	<p>as comprehensive or equivalent to those in your regional location of residence. Wherever we transfer your Personal Information, we will take reasonable steps to ensure that your privacy rights continue to be protected.</p>
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<p>13. Your Privacy Rights in California</p>	
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<p>If you live in California, you may have additional "rights" when it comes to your information. You can ask us to:</p> <ul style="list-style-type: none"> ● Give you a copy of the personal information we have collected about you in the last year; ● Fix your personal information if it is incorrect; ● Delete some of your personal information; and ● Request us to stop using your information in some situations. <p>If you want to understand more, please review our full privacy policy.</p>	<p>In accordance with applicable law, you have the following rights:</p> <ul style="list-style-type: none"> ● Access to/Portability of Personal Information. You can receive a copy of categories of Personal Information and specific pieces of Personal Information we have collected about you in the past 12 months, consistent with legal requirements. Residents also have the right to request the categories of Personal Information disclosed for a business purpose. In addition, you may have the right in some cases to receive or have your electronic Personal Information in a portable format or transferred to another party. ● Correction. You can request correction of your Personal Information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your Personal Information or we may refer you to the controller of your Personal Information who is able to make the correction. ● Deletion. You can request we delete Personal Information we collect or maintain about you, subject to certain exceptions prescribed by law. ● Restriction of or Objection to processing. You can request restriction or object to the processing of your Personal Information, and you have the right to opt in or opt out of the sale of your Personal Data to third parties, if applicable, where such requests are permitted by law. <p>Some of these rights can be exercised by updating your account within the Services, or you can contact us as set forth in Section 1 above for other requests. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request so that we can ensure you are the owner of the account making the request.</p>
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	Our California resident consumer request metrics for the previous year can be found here .
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14. Your Privacy Rights if you live in the EEA, UK or Switzerland

<p>If you live in the EEA, the UK or Switzerland, you may have additional "rights" when it comes to your personal information. You can ask us to:</p> <ul style="list-style-type: none"> • Tell you what information we have about you and what we do with it; • Fix your personal information if it's incorrect; • Delete your information. <p>If you want to understand more, you can refer to the full privacy policy.</p> <p>If you have reason to, you can complain about how we are using your information by emailing us at roblox@gdpr-rep.com. You can also complain to a "data protection authority". You can find out about which "data protection authority" to complain to in your country here.</p>	<p>1. In the course of visiting our websites and apps, and/or using our services and products, we may process the following Personal Information:</p> <ul style="list-style-type: none"> ○ Information relating to a job application made by you, like your name, email address, employment details, CV, resume or other details of your employment history sent by you. We will process this information to process and respond to your job application. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR ("necessary for entering into an employment contract with us"). ○ Login information, which may include your IP address, device type, name, date and time of your visit, information on your browser version, information on your operating system, including language settings, MAC addresses, and User ID. We will process this information to provide you with our Service. The legal basis for this processing activity is Article sec. 1 sent. 1 lit. b ("performance of a contract") and lit. f ("legitimate interest") GDPR. It is in our legitimate interest to guarantee the Services' stability and security. ○ Account information, e.g. information such as your name, username, login and password details, location information, user-generated content, contact details and other Personal Information that are used for participating in the Service we are offering. We process this information to provide our Services to you. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract"). ○ Email addresses you provided us with for added verification and/or to enable certain features. The bases for
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processing this personal data are Article 6 sec. 1 sent. 1 lit. b (“performance of a contract”) and f (“legitimate interest”) GDPR. Roblox has a legitimate interest in providing a safe and secure Service, especially to protect children.

- Billing and payment information, when you participate in Developer Exchange or purchase virtual currency or premium subscriptions, including your name, billing address, credit card or other payment information and billing information. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”). We may also retain transaction details and purchase and payment history. The legal basis for processing these personal data is our legitimate interest in being able to resolve subsequent billing disputes and inquiries, Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”).
- Information relating to contacting our customer service, e.g. when you report a problem, submit questions, concerns or comments. We may process your email address, your name and information relating to your inquiry or concern in order to respond to your communications, fulfill your requests, or provide other customer support. This processing activity is based on your consent according to Article 6 sec. 1 sent. 1 lit. a GDPR and/or Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”), depending on the initial purpose for contacting our customer support.
- Comments or messages you post or transmit on Roblox via public chats, forums, group walls, personal post, etc. We process this information to monitor, filter and moderate this information for the purposes of being able to remove profanity, Personal Information, and other inappropriate conversations. Additionally, we may use pre-filtered comments and messages for other purposes such as

training and improving our filter technology. The legal basis for this processing activity is Roblox's legitimate interest in being able to defend ourselves from possible liability claims that may arise from unlawful comments posted by you, Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest"). Please note that any Personal Information submitted by you in forums and similar means offered by us is available to anyone who has access to this forum including other users. The Personal Information posted by you can be read, collected or used by other users of these forums and could be used to send unsolicited messages.

- Information required for participating in our Roblox Developer Exchange Program, like the IRS W-9 form (for U.S. taxpayers) or W-8 form (for non-U.S. taxpayers). The legal basis for this processing is Article 6 sec.1 sent. 1 lit. f GDPR ("legitimate interest") with regard to U.S. law requirements. It is our legitimate interest to comply with the legal requirements, especially with regard to U.S. anti-money laundering laws.
- Information relating to your use of or interaction with third party plug-ins, e.g. social plugins from Google, Facebook or Twitter. When you use these features, certain information from your social media accounts may be accessed by or shared with Roblox, and likewise, certain information about your use of Roblox may be posted to your profile on those platforms. The legal bases for this processing activity are Article 6 sec. 1 sent. 1 lit. a ("consent") and f ("legitimate interest") GDPR. We have a legitimate interest to improve your website experience and to optimize our service.
- Information processed to enable advertising. To market our services, inter alia, via social media platforms in order to bring new users to our websites and to maintain and

increase our user base, we may process Personal Information such as IP addresses, information on users' browser or operating system, including language settings, location information and user names or user IDs. The legal basis for the processing of this data is Roblox's legitimate interest in maintaining our user base, bringing new users to our websites and informing (potential) users about interesting events, Art. 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest").

- Information relating to the use of location-based service. In order to provide Services such as tagging, check-in and content delivery, or other services that require knowing where you are, we may process your location information. This processing is based on Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract") and/or Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest") and represents our legitimate interest to improve your website experience and to optimize our services. Please note that you can always stop the collection of location information by updating your device settings, stopping to use the Service, or uninstalling our mobile applications.
- Information relating to your participation in contests, competitions, sweepstakes, giveaways, prize draws or other promotions that we may run on our Service or sponsor from time to time. We may process certain contact information (such as your name, email address, and/or phone number) for prize fulfillment purposes, as well as other information or content needed for the specific promotion. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract").
- Cookies. We will use certain cookies only if you have previously consented to such use. When you visit our website with an EEA IP address, a cookie banner will appear asking you

for your consent. You can manage your choice by clicking on “manage cookie preferences” in the cookie banner. We will save your choices in the form of a cookie. This cookie has a limited effective period of one year. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”). In addition, you can also manage cookies using your browser settings. For further information on cookies and similar technologies see Section 6 above.

2. Please note that we do not use your Personal Information for automated decision making which produces legal effects concerning you or similarly significantly affects you.

Personal data of children

Please note that when users under the age of 13 register for the Service, their account is automatically set to “Privacy Mode.” This means that these users will not have access to certain features, such as social media plug-ins, some forms of third party advertising, and certain types of notification alerts.

When a child creates an account on Roblox, we may process a username, password, birthdate and parent email address. We process this information to give the user access to the Service and to communicate with the parent about the minor’s account (if a parent email was provided). For example, we may use the parent’s email to send an email notification about the child’s account creation and an invitation for the parent to review, update settings, and approve of their child’s account. We may use the birthdate the child provides when signing up for the Service to determine which features on Roblox the child should have access to and to determine when the child will turn 13 years old and can be given broader access to features on our Service. This processing activity is based on Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”). In general, we will not use or share account information (including Personal Information) from a minor’s account except for the permissible purposes stated in this Privacy Policy, and, if required by law, only with the prior verifiable consent of a parent or legal guardian (Article 6 sec. 1 sent. 1 lit. a and Article 8 sec. 1 GDPR).

Data sharing

Roblox may share users' information, including Personal Information like billing information or usernames, with our third-party agents, contractors, or service providers who are hired to perform services on Roblox's behalf.

These providers may operate or support certain functions of the Service. Below is an illustrative list of functions for which we may use third party service providers and the names of the providers we may use to perform these functions:

- Account Integrity and Security (e.g., Veriff, Arkose Labs);
- Analytics services (e.g., Google LLC);
- User Acquisition services (e.g., AppsFlyer);
- Community filtering and moderation services (e.g., CommunitySift);
- Customer support services (e.g., Zendesk);
- Surveys and promotions (e.g., Reach3);
- Social Media Log-in (e.g., SAP Customer Data Cloud);
- Billing services and payment gateway providers (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Xsolla); and
- Hosting and content delivery network services (e.g., AWS, Equinix, CenturyLink, YouTube, Vimeo).

3. The legal basis for this data transfer and processing activity is Article 28 of GDPR in conjunction with the data processing agreements we concluded with respective third-party agents. These agents and contractors are only allowed to use the information shared with them only for the specific tasks they've been hired to do and consistent with this Privacy Policy, and for no other purposes. Roblox takes steps to ensure that all service providers with access to Personal Information are capable of protecting the information we share with them.

Legal disclosure

We may disclose Personal Information about you, including the content of your communications on the Service, to comply with

legal process, including court orders and subpoenas, served on our Service. In addition, we also may disclose Personal Information about you, including content, in response to a request from law enforcement agencies, regulators, or other public agencies (including schools or children services), or if such disclosure may (i) prevent the instigation of a crime, (ii) facilitate an investigation related to public safety or protect the safety of a child using our Service, (iii) protect the security or integrity of our Service, or (iv) enable us to take precautions against liability or to protect our rights. The legal basis for such disclosure is Article 6 sec. 1 sent. 1 lit. c (“compliance with legal obligation”) in compliance with the respective EEA or Member State law and lit. f (“legitimate interest”) GDPR. It is our legitimate interest to comply with the legal requirements of U.S. law.

Storage and international transfer of your Personal Information

Roblox is based in the U.S. Your Personal Information that we collect is sent to and stored on secure servers located in the United States of America. Such storage is necessary in order to process the information.

Some of our agents and third-party service providers are located outside the European Economic Area, e.g. the United States. The data protection laws of the United States or other countries may not be as comprehensive or equivalent to those in your country of residence. Wherever we transfer your Personal Information, we will take reasonable steps to ensure that your privacy rights continue to be protected, e.g. conclude the EU Standard Contractual Clauses with third parties.

Your rights

If you are a user based in the European Economic Area, you may be entitled to exercise some or all of the following rights:

- Require (i) information whether your Personal Information is retained and (ii) access to or duplicates of your Personal Information retained, including the purposes of the processing, the categories of Personal Information concerned, and the data recipients as well as potential retention periods;
- Request rectification, removal or

restriction of your Personal Information, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn;

- Refuse to provide and – without impact to data processing activities that have taken place before such withdrawal – withdraw your consent to processing of your Personal Information at any time;
- Object, on grounds relating to your particular situation, to processing of your Personal Information, in case such processing is either based on our or a third party's legitimate interests or on a performance of a task carried out in the public interest. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your Personal Information or present you our compelling legitimate grounds for an ongoing processing;
- Object to the use of your Personal Information for direct marketing at any time;
- Take legal actions in relation to any potential breach of your rights regarding the processing of your Personal Information, as well as to lodge complaints before the competent data protection regulators; and/or
- Require (i) to receive the Personal Information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those data to another controller without hindrance from our side. Where technically feasible you shall have the right to have the Personal Information transmitted directly from us to another controller.

4. You may (i) exercise the rights referred to above, (ii) pose any questions, or (iii) make any complaints regarding our data processing

	<p>by contacting us under the contact details set out above in Sec. 1.</p>
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15. Additional Information for users in Brazil

<p>If you are a resident of Brazil, you may be entitled to additional privacy rights. Please review the detailed section of our privacy policy in Section 15.</p> <p>If you live in Brazil, you may have additional "rights" when it comes to your personal information. You can ask us to:</p> <ul style="list-style-type: none"> • Tell you what information we have about you and what we do with it; • Fix your personal information if it's wrong; • Delete your information. <p>If you want to understand more it might be useful to ask your parent or guardian to explain this section to you. Your parent or guardian can refer to the detailed version of this Policy.</p> <p>If you have reason to, you can complain about how we are using your information by emailing us at privacy@roblox.com. You can also complain to the National Data Protection Authority of Brazil.</p>	<p>1. In the course of visiting our websites and apps, and/or using our services and products, we may process the following personal data:</p> <ul style="list-style-type: none"> ○ Data relating to a job application made by you, like your name, email address, employment details, CV, resume or other details of your employment history sent by you. We will process this information to process and respond to your job application. ○ Login information, which may include your IP address, device type, name, date and time of your visit, information on your browser version, information on your operating system, including language settings, MAC addresses, and User ID. We will process this information to provide you with our Service and to guarantee the Services' stability and security. ○ Account information, e.g. information such as your name, username, login and password details, location information, user-generated content, contact details and other Personal Information that are used for participating in the Service we are offering. We process this information to provide our Services to you. ○ Email addresses you provided us with for added verification and/or to enable certain features. We use that data to provide a safe and secure Service, especially to protect children. ○ Billing and payment information, when you participate in Developer Exchange or purchase virtual currency or premium subscriptions, including your name, billing address, credit card or other payment information and billing information. We may also retain transaction details and purchase and payment history. ○ Information relating to contacting our customer service, e.g. when you report a problem, submit questions, concerns or comments. We may process your email address, your name and information relating to your
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inquiry or concern in order to respond to your communications, fulfill your requests, or provide other customer support.

- Comments or messages you post or transmit on Roblox via public chats, forums, group walls, personal post, etc. We process this information to monitor, filter and moderate this information for the purposes of being able to remove profanity, Personal Information, and other inappropriate conversations. Additionally, we may use pre-filtered comments and messages for other purposes such as training and improving our filter technology. Please note that any Personal Information submitted by you in forums and similar means offered by us is available to anyone who has access to this forum including other users. The Personal Information posted by you can be read, collected or used by other users of these forums and could be used to send unsolicited messages.

- Information required for participating in our Roblox Developer Exchange Program, like the IRS W-9 form (for U.S. taxpayers) or W-8 form (for non-U.S. taxpayers). We process that data to comply with the legal requirements, especially with regard to U.S. anti-money laundering laws, which we are subject to.

- Information relating to your use of or interaction with third party plug-ins, e.g. social plugins from Google, Facebook or Twitter. When you use these features, certain information from your social media accounts may be accessed by or shared with Roblox, and likewise, certain information about your use of Roblox may be posted to your profile on those platforms. We use that information to improve your website experience and to optimize our service.

- Information processed to enable advertising. To market our services, inter alia, via social media platforms in order to bring new users to our websites and to maintain and increase our user base, we may process Personal Information such as IP addresses, information on users' browser or operating system, including language settings, location information and user names or user IDs.

- Information relating to the use of location-based service. In order to provide Services such as tagging, check-in and content delivery, or other services that require knowing where you are, we may process your location information. This information is used to improve your website experience and to optimize our services.

Please note that you can always stop the collection of location information by updating your device settings, stopping to use the Service, or uninstalling our mobile applications.

- Information relating to your participation in contest, competitions, sweepstakes, giveaways, prize draws or other promotions that we may run on our Service or sponsor from time to time. We may process certain contact information (such as your name, email address, and/or phone number) for prize fulfillment purposes, as well as other information or content needed for the specific promotion.

- Cookies. We will use certain cookies only if you have previously consented to such use. When you visit our website with an EEA IP address, a cookie banner will appear asking you for your consent. You can manage your choice by clicking on “manage cookie preferences” in the cookie banner. We will save your choices in the form of a cookie. This cookie has a limited effective period of one year. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”). In addition, you can also manage cookies using your browser settings. For further information on cookies and similar technologies see Section 6 above.

2. Please note that we do not use your Personal Information for automated decision making which produces legal effects concerning you or similarly significantly affects you.

3. *Personal data of children* and Parental Consent.

Please note that when users under the age of 13 register for the Service, their account is automatically set to “Privacy Mode.” This means that these users will not have access to certain features, such as social media plug-ins, some forms of third party advertising, and certain types of notification alerts.

When a child creates an account on Roblox, we may process a username, password, birthdate and parent email address. We process this information to give the user access to the Service and to communicate with the parent about the minor’s account (if a parent email was

provided). For example, we may use the parent's email to send an email notification about the child's account creation and an invitation for the parent to review, update settings, and approve of their child's account. We may use the birthdate the child provides when signing up for the Service to determine which features on Roblox the child should have access to and to determine when the child will turn 13 years old and can be given broader access to features on our Service.

4. Data sharing

Roblox may share users' information, including Personal Information like billing information or usernames, with our third-party agents, contractors, or service providers who are hired to perform services on Roblox's behalf.

These providers may operate or support certain functions of the Service. Below is an illustrative list of functions for which we may use third party service providers and the names of the providers we may use to perform these functions:

- Account Integrity and Security (e.g., Veriff, Arkose Labs);
- Analytics services (e.g., Google LLC);
- User Acquisition services (e.g., AppsFlyer);
- Community filtering and moderation services (e.g., CommunitySift);
- Customer support services (e.g., Zendesk);
- Surveys and promotions (e.g., Reach3);
- Social Media Log-in (e.g., SAP Customer Data Cloud);
- Billing services and payment gateway providers (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Xsolla); and
- Hosting and content delivery network services (e.g., AWS, Equinix, CenturyLink, YouTube, Vimeo).

16.5 Legal disclosure

We may disclose Personal Information about you, including the content of your communications on the Service, to comply with legal process, including court orders and subpoenas, served on our Service. In

addition, we also may disclose Personal Information about you, including content, in response to a request from law enforcement agencies, regulators, or other public agencies (including schools or children services), or if such disclosure may (i) prevent the instigation of a crime, (ii) facilitate an investigation related to public safety or protect the safety of a child using our Service, (iii) protect the security or integrity of our Service, or (iv) enable us to take precautions against liability or to protect our rights.

6. Storage and international transfer of your personal data

Roblox is based in the U.S. Your Personal Information that we collect is sent to and stored on secure servers located in the United States of America. Such storage is necessary in order to process the information.

Some of our agents and third-party service providers are located outside of Brazil, e.g. the United States. The data protection laws of the United States or other countries may not be as comprehensive or equivalent to those in Brazil. Wherever we transfer your Personal Information, we will take reasonable steps to ensure we rely on a legitimate international transfer mechanism, as set out in Brazilian data protection laws.

7. Your rights as a Data Subject

As a data subject located in Brazil, you have rights regarding your personal data. We provide mechanisms, as detailed below, so that you have clarity and transparency in exercising your rights. Whenever necessary, our team will be ready to meet any requests.

Confirm and access your personal data: You may request details and/or a copy of your personal data that is processed by us.

Update or correct your personal data: If You wish to alter your personal data or if you have any reason to believe or suspect that any data we have about you is wrong or incomplete, you may request us to rectify it.

	<p><i>If you wish, you may withdraw your consent, delete, block, request the anonymization or the portability of your data:</i> You may (i) withdraw your consent, whenever the processing of personal data is based on consent; or (ii) request deletion of your personal data or deactivation of your account, at any time, in accordance with the law. The withdrawal of consent will prevent you from using the Services, and will result in the interruption of the processing of your data, except (i) the anonymized data; and (ii) data necessary to Roblox and/or to third parties involved in the provision of the Services for judicial, arbitration or administrative defense purposes, as well as to comply with legal and regulatory obligations.</p> <p>To exercise your rights or ask questions, you can contact us by completing this Customer Support Form.</p>
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16. Privacy Policy Changes and Updates

<p>We update this privacy policy sometimes, so you should review this site regularly. We always publish the date of the latest version at the bottom of this page.</p> <p>If we make any major changes, we will let you know by email (if we have your email address) or by showing a prominent notice on this website or in app prior to the change becoming effective. If required by law, we will obtain your parent's consent if any of these changes impact you.</p>	<p>We may update this Privacy Policy to reflect changes to our information practices at any time, so please review it frequently. If we update this Policy, changes will be reflected on this page and we will update the "Last Updated" date posted below. If we make any material changes to this Privacy Policy, we will attempt to notify you by email (if you have provided us with your email address, by sending an email to the email address specified in your account) or by means of a prominent notice on this website prior to the change becoming effective. We will obtain prior parental consent if any changes we make to this Policy affect users under the age of 13 in a way that requires such consent under COPPA or the age of 16 (or as per the age derogation by Member States in their domestic law) or 13 in the UK, under the European and UK General Data Protection Regulation.</p>
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