Privacy Policy

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This privacy policy governs the processing of personal data collected through the website https://www.playeuchre-online.com/, the related mobile applications and services (collectively, "**Website**"). Please read this document carefully to make sure that you understand how we handle your personal data. If you have any further questions regarding our data protection practices, please feel free to contact us.

Our privacy policy explains in detail:

- What personal data ("**PD**") and non-personal data ("**NPD**") we collect from you, for what purposes we use it, how we protect it, and how we share it with third parties;
- How you can access and change your PD and how you can limit our sharing of it; and
- Your legal rights that you have with respect to your PD.

The topics covered in this privacy policy include:

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1. General Information and Definitions

1.1 **About the Website.** The Website allows you to play euchre online.

1.2 **Our role as a data controller.** The entity that is responsible for the processing of your PD though the Website is Landocs Ventures LTD having an address at Hasaham 30, Petah tiqwa, 49517 Is rael ("**we**", "**us**", and "**our**"). We act as a data controller with regard

to your PD collected through the Website (e .g., when you register your user account, browse the Website, or communicate with us) because we make decisions about the types of PD that should be collected from you and the purposes for which such PD should be used.

1.3 **Applicable laws.** We process PD in accordance with applicable data protection laws, including, but not limited to, the Israeli Protection of Privacy Law, the EU General Data Protection Regulation ("**GDPR**"), and the California Consumer Privacy Act ("**CCPA**").

1.4 **Definitions.** In this privacy policy, you will encounter recurrent terms . For your convenience, we would like to explain what they mean:

- "**NPD"** means non-personal data that does not allow us to identify you in any manner;
- "**PD**" means personal data, i.e., any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. PD is in many ways the same as Personally Identifiable Information (PII). However, PD is broader in scope and covers more data.
- **"Visitor**" is someone who merely browses our Website. A **"member**" is someone who has registered with us to use our services. The terms **" user**", "**you**", and "**you**r" are collective identifiers that refer to either a visitor or a member.
- "**Consent**" means a freely given, specific, informed, and unambiguous agreement to the processing of PD.
- "**Data controller**" means the entity that determines the purposes and means of the processing of PD.
- "**Data processor**" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.
- "**Processing**" means the use of PD in any manner, including, but not limited to, collection, storage, erasure, transfer, and disclosure of personal data.

1.5 **Cookies.** We use cookies on the Website. For more information on the types and purposes of our cookies, please refer to our cookie policy available at https://www.playeuchre-online.com/PlayEuchre_cookie_scan_report.pdf.

2. Types and Purposes of PD and NPD that We Process

2.1 **PD that we collect.** We comply with data minimisation principles and collect only a minimal amount of PD that is necessary to ensure your proper use of the Website. The types of PD that we collect and process are listed below. We process your PD only for specified and legitimate purposes explicitly mentioned in this privacy policy. In short, we will use your PD only for the purposes of enabling you to use the full functionality of the Website, providing you with the requested services, maintaining and improving the Website, conducting research about our business activities, administrative purposes, and replying to your enquiries. The detailed description of the purposes and legal basis for processing of your PD is provided below.

Situation/PD	Purpose	Legal basis
When you register your user account, we collect your: • Email address • Username • Password • Picture When you register your user account by using your Facebook account, we collect your: • Email address • Full name • Picture • Other information that you allow Facebook to share	• To create and maintain your user account • To provide access to the Website • To provide you with the requested services • To contact you, if necessary • To ensure security of the Website	• Performing a contract with you • Pursuing our legitimate business interests (i.e., to ensure security) • Your consent (optional personal data)
When you contact us by email or through the contact form, we collect your: • Name • Email address • Information you provide in your message	▪ To respond to your enquiries ▪ To provide you with the requested information	• Pursuing our legitimate business interests (i.e., to grow and promote our business) • Your consent (for optional personal data)
When you use the Website, we collect your: • IP address • Cookie-related data (please refer to our cookie policy for more information)	• To analyse, improve, and evaluate our business activities • To personalise the Website for your location • To ensure security of the Website	• Pursuing our legitimate business interests (i.e., to analyse and improve our business activities and ensure security) • Your consent (for certain cookie-related data)
When you are served advertisement on the Website, the following PD and NPD is collected from you:* • IP address; • Geographic location; • Advertising ID; • Your access and use patterns; and • Information about redirection to other websites related to the advertisement. *Please refer to section 13 for more information.	• To tailor the advertisement to you; • To retarget content to you; • To personalise your experience on the Website.	• Your consent; or • Pursuing our legitimate business interests (i.e., to support and expand our business).

2.2 **NPD that we collect.** When you use the Website, we automatically receive information from your web browser or mobile device. This information includes the name of the website from

which you entered our Website, if any, as well as the name of the website you'll visit when you leave our Website. This information also includes your Internet service provider's name, your web browser type, the type of mobile device, your computer operating system, and data about your browsing activity when using our Website. We use all this NPD to (i) analyse trends among our users to help improve our Website, (ii) identify and fix errors, and (iii) develop additional features and services.

2.3 **PD obtained from third parties.** When using the Website, you can choose to permit or restrict services, functionalities, and integrations provided by third parties, including, but not limited to, social media service providers ("**Third-Party Services**"). Once enabled, the providers of the Third-Party Services may share certain information and PD with us, subject to the privacy policy of the Third-Party Services. We will use such PD only for the purposes for which it was provided. You are strongly encouraged to check carefully the privacy settings and notices of the Third-Party Services to understand what information may be disclosed to us.

2.4 **What Happens If You Don't Give Us Your PD?** If you do not provide us with the PD when requested, we may not be able to provide you with all our products and services. However, you can access and use some parts of our Website without giving us your PD.

2.5 **Sensitive data.** We do not intentionally collect special categories of personal data ('sensitive data'), such as opinions about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about sexual orientation.

2.6 **Your feedback**. If you contact us, we may keep records of any questions, complaints or compliments made by you and the response, if any. Where possible, we will de-identify your PD. Please note that de-identified PD is also considered to be NPD.

2.7 **Aggregated data.** In case your NPD is combined with certain elements of your PD in a way that allows us to identify you, we will handle such aggregated data as PD. If your PD is de-identified in a way that it can no longer be associated with an identified or identifiable natural person, it will not be considered PD and we may use it for any legitimate business purpose.

3. Sharing Your PD and NPD with Third Parties

3.1 **Selling your PD and NPD.** WE DO NOT SELL YOUR PD TO THIRD PARTIES FOR MARKETING OR OTHER PURPOSES. The term "sell" refers to selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, your PD by us to another business or a third party for monetary or other valuable consideration. For data aggregation purposes, we may use your NPD, which might be sold to other parties at our discretion. Any such data aggregation would not contain any of your PD.

3.2 **Sharing PD with our data processors.** If necessary for the purposes listed below, we will share your PD specified in section 2.1 with our third-party service providers we hire to provide services to us ("**Our Processors**"). Our Processors include, but are not limited to, web analytics companies, advertising networks, call centres, data management services, help desk providers, accountants, law firms, auditors, shopping cart and email service providers. The disclosure of your PD to Our Processors is limited to the situations when such data is required for the following purposes:

- Ensuring the proper operation of our Website;
- Ensuring the delivery of the services requested by you;
- Providing you with the requested information;
- Pursuing our legitimate business interests;
- Enforcing our rights, preventing fraud, and security purposes;
- Carrying out our contractual obligations;
- Law enforcement purposes; or
- If you provide your prior consent to such a disclosure.

3.3 **List of Our Processors.** We will share your personal data only with Our Processors that ag ree to ensure an adequate level of protection of personal data that is consistent with this privacy policy and the applicable data protection laws. Our Processors that may have access to your PD are listed below.

Service	Name	Location	More information
Hosting service provider	Linode & Amazon (AWS)	Linode hosting – Texas, US AWS – Virginia US	https://www.linode.com/ https://aws.amazon.com/
Business analytics service provider	Google Analytics	United States	https://analytics.google.com
Header bidding partner	Adapex	United States	https://adapex.io/
Email service provider	Sendgrid	United States	https://sendgrid.com
Technical support service providers	IT Syndicate	IT Syndicate	HongKong
	Freshdesk	United States	https://freshdesk.com
Automated Video advertising partner	Primis	Israel	https://www.primis.tech/
Advertising network	Google Adexchange	United States	https://admanager.google.com/home/
Our group of companies	Landocs Holdings Ltd, Ran Ventures Ltd, Komantra Holdings Ltd, Keeper Holdings Ltd		
Software developing partners and business advisors	Independent contractors		

3.4 **Legally required releases of PD.** We may be legally required to disclose your PD if such disclosure is: (i) required by subpoena, law, or other legal process; (ii) necessary to assist law enforcement officials or government enforcement agencies; (iii) necessary to

investigate violations of or otherwise enforce our legal terms ; (iv) necessary to protect us from legal action or claims from third parties, including you and/or other users or members; or (v) necessary to protect the legal rights, personal/real property , or personal safety of our company, users, employees, and affiliates.

3.5 **Disclosures to successors.** If our business is sold or merges in whole or in part with another business that would become responsible for providing the Website to you, we retain the right to transfer your PD to the new business. The new business would retain the right to use your PD according to the terms of this privacy policy as well as to any changes to this privacy policy as instituted by the new business. We also retain the right to transfer your PD if our company files for bankruptcy and some or all of our assets are sold to another individual or business.

3.6 **Disclosure of NPD.** We may disclose your NPD and de-identified PD for any purpose. For example, we may share it with prospects or partners for business or research purposes, for improving the Website, responding to lawful requests from public authorities, or developing new products and services.

3.7 **Google reCAPCHA.** We have implemented reCAPCHA, the service provided by Google (Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA) to verify whether you are a human being and not a robot. It helps to protect the Website against spam and abuse. When you use reCAPCHA, Google will collect some PD and NPD from you, such as (i) cookie-related data, (ii) your IP address, (iii) information about your mouse clicks, (iv) CSS information of the Website, (v) date, (vi) browser language,
(vii) plug-ins installed in the browser, and (viii) javascript objects. Such data will be sent to Google. We have a legitimate interest in protecting the Website from abusive automated crawling and spam. For more information about Google reCAPTCHA and Google's privacy policy, please visit the following links: https://www.google.com/intl/de/policies/privacy/ and https://www.google.com/recaptcha/intro/android.html.

4. Transfer of PD Outside Your Country

4.1 The PD that we collect from you may be stored , processed, and transferred between any of the countries in which we or Our Processors operate. For example, if you reside in the European Economic Area (EEA), we may need to transfer your personal data to jurisdictions outside the EEA.

4.2 Wherever we transfer, process or store your PD, we will take reasonable steps to protect it. For example, we will make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection for your PD (e .g., the country in which the recipient is located is white-listed by the European Commission or the recipient is a Privacy-Shield certified entity) or we conclude an agreement with the respective third party that ensures such protection (e.g., a data processing agreement based on the Standard Contractual Clauses provided by the European Commission).

4.3 The European Commission has not found the United States and some other countries where we and our Processors are located to have an adequate level of protection of PD under Article 45 of the GDPR. We rely on derogations for specific situations as defined in Article 49 of the GDPR. We will use your PD to provide the goods, services, and/or

information you request from us to perform a contract with you or to satisfy a legitimate interest of our company in a manner that does not outweigh your freedoms and rights.

5. Retaining and Destroying Your PD and NPD

5.1 **Retention of PD.** We retain information that we collect from you (including your PD) only for as long as we need it for legal, business, or tax purposes. We always make sure that we have a lawful basis for storing your PD. Your information may be retained in electronic form, paper form, or a combination of both. When your PD is no longer needed and there is no lawful basis for storing it, we will securely destroy, delete, or erase it.

5.2 **Retention of NPD.** We may retain your NPD for as long as necessary for the purposes described in this privacy policy. This may include keeping NPA for the period that is necessary to pursue our legitimate business interests , conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

5.3 **Retention as required by law.** Please note that, in some cases, we may be obliged by law to store PD for a certain period of time (e.g ., we have to keep our accountancy records for the time period prescribed by law). In such cases, we will store PD for the time period stipulated by the applicable law and delete it as soon as the required retention period expires.

6. Your Rights Regarding Your PD

6.1 **Updating Your PD.** You can update your PD using services found on our Website. If no such services exist, you can contact us using the contact information found at the bottom of this privacy policy and we will help you.

6.2 **Revoking Your Consent for Using Your PD.** You have the right to revoke your consent for us to use your PD at any time, if you have provided such a consent. Your opt-out will not affect disclosures otherwise permitted by law including but not limited to: (i) disclosures to affiliates and business partners; (ii) disclosures to third-party service providers that provide certain services for our business, such as credit card processing, computer system services and data management services; (iii) disclosures to third parties as necessary to fulfill your requests ; (iv) disclosures to governmental agencies or law enforcement departments, or as otherwise required to be made under applicable law; (v) previously completed disclosures to third parties; or (vi) disclosures to third parties in connection with subsequent contests or promotions you may choose to enter, or third-party offers you may choose to accept. If you want to revoke your consent for us to use your PD, please contact us using the contact information found at the bottom of this privacy policy and we will help you. You can easily opt-out from our marketing communication by clicking on the “unsubscribe” link included in every marketing email sent by us.

6.3 **You rights.** When using our Website and submitting PD to us, you may have certain rights under the GDPR, the CCPA, and other applicable laws. Depending on the legal basis for processing your PD, you may have some or all of the following rights:

- **The right to be informed.** You have the right to be informed about the PD we collect from you, and how we process it.
- **The right of access.** You have the right to get confirmation that your PD is being processed and have the ability to access your PD.
- **The right to rectification.** You have the right to have your PD corrected if it is inaccurate or incomplete.
- **The right to erasure** (right to be forgotten). You have the right to request the removal or deletion of your PD if there is no compelling reason for us to continue processing it.
- **The right to data portability.** You have the right to request and get your PD that you provided to us and use it for your own purposes. We will provide your PD to you in a machine-readable format (e.g., a .pdf file) within 30 days of your request.
- **The right to restrict processing.** You have a right to **'**block **'**or restrict the processing of your PD. When your PD is restricted, we are permitted to store your PD, but not to process it further.
- **The right to object.** You have the right to object to us processing your PD for the following reasons:
  (i) If the processing was based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
  (ii) Direct marketing (including profiling); and
  (iii) Processing for purposes of scientific/historical research and statistics.
- **Automated individual decision-making and profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Filing a complaint with authorities.** You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with the applicable laws. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

6.4 **How to exercise your rights?** If you would like to exercise your rights, please contact us by using the contact details at the end of this privacy policy and explain in detail your request. You can contact us electronically (by email or via our contact form) or by post, whichever method you prefer. In order verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information, so that we would be able to locate you in our system (we will use such information for verification purposes only). We will answer your request within a reasonable timeframe but no later than 30 days. We will provide your PD in a portable and readily usable format. You can exercise your rights free of charge up to 2 times per year. We will direct all our services providers, including Our Processors , to act according to your request. Please note that, in certain cases (e.g ., if we need your PD for completing a transaction, carry out our contractual obligations, comply with the applicable laws, or carry out our legitimate business interests), we may not be able to delete your PD from our systems.

6.5 **How to launch a complaint?** If you would like to launch a complaint about the way in which we handle your personal data, we kindly ask you to contact us first and express your concerns. After you contact us, we will investigate your complaint and provide you with our response as soon as possible (no later than 30 days). If you are not satisfied with the

outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

7. Protecting the Privacy Rights of Third Parties

If any postings you make on our Website contain information, including PD, about third parties, you must make sure you have the permission to include that information in your posting. While we are not legally liable for the actions of our users, we reserve the right to remove any postings about which we are notified, if such postings violate the privacy rights of others.

8. Do Not Track Settings

Some web browsers have settings that enable you to request that our Website not track your movement within our Website. Our Website does not obey such settings when transmitted to and detected by our Website. You can turn off tracking features and other security settings in your browser by referring to your browser's user manual.

9. Links to Third-Party Websites

Our Website may contain links to other websites. These third-party websites are not under our control and are not subject to our privacy policy. Third-party websites will likely have their own privacy notices. We have no responsibility for these third-party websites and we provide links to these websites solely for your convenience. You acknowledge that your use of and access to these websites are solely at your risk. It is your responsibility to check the privacy notices of any third-party websites to see how they treat your PD.

10. Protecting Children's Privacy

Our Website is not designed for use by anyone under the age of 18. Thus, we do not knowingly collect PD from children under the age of 18. If you are a parent or guardian and believe that your child under the age of 18 is using our Website or submit any PD through it, please contact us. Before we remove any PD from our systems, we may ask for proof of identification to prevent malicious removal of account information. If we discover that a child under the age of 18 is accessing our Website, we will delete his/her PD within a reasonable period of time.

11. Our Email Policy

11.1 **Marketing messages.** Normally, we do not send you marketing messages. However, if we decide to do so and you sign up to receive our newsletter or provide your consent, we will, from time to time, send you marketing messages, such as newsletters, brochures, promotions and advertisements , informing you about our new services or new features of the Website. We will not sell, ren t, or trade your email address to any unaffiliated third party without your permission.

11.2 **Opting-out.** If you receive any marketing-related emails, you will be able to easily opt-out from receiving marketing messages by clicking on the "unsubscribe" link included in every email.

11.3 **Informational notices.** From time to time, we may send you informational notices, such as service-related, technical or administrative emails, information about the Website, your privacy and security , and other important matters. Please note that we will send such notices on an "if-needed" basis and they do not fall within the scope of direct marketing communication that requires your prior consent.

12. Our Security Policy

12.1 We have built our Website using industry-standard security measures and authentication tools to protect the security of your PD. We and Our Processors also maintain technical and physical safeguards to protect your PD.

12.2 We implement organisational and technical information security measures to protect your PD from loss, misuse, unauthorised access, and disclosure. The security measures taken by us include secured networks (we use SSL encryption), strong passwords, DDOS mitigation, limited access to your PD by our staff, and anonymisation of PD (when possible).

12.3 When we collect your credit card information through our Website, we will encrypt it before it travels over the Internet using industry-standard technology for conducting secure online transactions. Unfortunately, we cannot guarantee against the loss or misuse of your PD or secure data transmission over the Internet because of its nature. We use third-party billing services and have no control over these services. We use our commercially reasonable efforts to make sure your credit card number is kept strictly confidential by using only third-party billing services that use industry-standard encryption technology to protect your credit card number from unauthorised use.

12.4 We strongly urge you to protect any password you may have for our Website and to not share it with anyone. You should always log out of our Website when you finish using it, especially if you are sharing or using a computer in a public place.

12.5 **Security breaches.** Although we put our best effort to protect your PD, given the nature of communications and information processing technology and the Internet, we cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your PD caused by circumstances that are beyond our reasonable control. In case a PD breach occurs , we will immediately take reasonable measures to mitigate the breach, as required by the applicable law. Our liability for any security breach will be limited to the highest extent permitted by the applicable law.

13. Personalised (Targeted) Advertising

13.1 **The Ads.** On the Website, you can encounter personalised advertising and marketing materials by video (collectively, the "**Ads**") that are served to you as a part of our cooperation with third-party vendors, including the advertising network Google AdSense (https://www.google.com/adsense/start/) and automated advertising service provider Primis (https://www.primis.tech) (collectively, the "**Partners**"). The Ads may be served to you directly on the Website or through the video games that you play. We merely host the Ads; we do not create the Ads or bear any responsibility for the content of the Ads. The Ads are served on the basis of your visits to the Website and other sites on the Internet.

13.2 **PD and NPD collected through the Ads.** When you visit the Website, we collect your cookie-related data in accordance with our cookie policy available at https://www.playeuchre-online.com/PlayEuchre_Cookie_Policy.pdf, as well as other online identifiers, PD and NPD, such as:

- Your IP address;
- The domain name that serves you the Ads;
- The geographic location of your computer system;
- Your advertising ID;
- Your access to the Ads and your use of the Ads; and
- Information about redirection to other websites related to the Ads.

The PD and NPD collected through the Ads are used for advertising and marketing purposes, such as:

- To tailor the Ads to you;
- To retarget content to you;
- To personalise your user experience on the Website; and
- To operate, provide, analyse, maintain, manage, and improve the Website and the services provided by the Partners.

The lawful bases on which we rely when processing the data listed above are (i) your consent (if applicable) and (ii) pursuing legitimate business interests (i.e., to grow our business).

13.3 **Disclosure of PD and NPD collected through the Ads.** The PD and NPD specified in section 13.2 may be disclosed to the Partners for advertising purposes, in accordance with section 3 of this privacy policy. The Partners act as data processors with regard to such data. For more information on their privacy practices, please refer to https://www.primis.tech/privacy-policy and https://policies.google.com/privacy?hl=en, respectively.

13.4 **Consent.** In certain cases (e.g., if you are located in the EU), we may ask you to provide consent to our use of cookies and other tracking technologies related to the Ads. For more information on our cookie consent, please refer to our cookie policy available at https://www.playeuchre-online.com/PlayEuchre_Cookie_Policy.pdf.

13.5 **Opting out from personalised advertising.** You can control how personalised advertising is shown to you or opt-out from targeted advertising by consulting the guide powered by the Digital Advertising Alliance (DAA) available at https://youradchoices.com. The DAA offers tools for consumers to opt-out from using their PD for advertising (for websites and mobile applications): https://youradchoices.com/control. For more information on opting-out from advertising features on your device, please consult the Network Advertising Initiative: https://www.networkadvertising.org .

13.6 When you use our website and enter your email address on our website (either to log in, or sign up for a newsletter, or similar), we may share with solution providers and its group companies information that we collect from you, such as your email (in hashed, pseudonymous form), IP address, or information about your browser or operating system, with any of the following, acting as “joint controllers” (as applicable and defined in the GDPR).

This Site is affiliated with Adapex INC for the purposes of placing advertising on the Site, and Adapex INC will collect and use certain data for advertising purposes. Learn more about Adapex’s data usage here.

13.7 We use third-party advertising companies to serve ads when you visit our website. These companies may use aggregated information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please see: [http://www.networkadvertising.org/managing/opt_out.asp]

14. Term and Changes to Our Privacy Policy

14.1 **Term.** This privacy policy enters into force on the effective date indicated at the top of the privacy policy and remains valid until terminated or updated by us.

14.2 **Changes.** We reserve the right to change this privacy policy at any time. If we decide to do so, we will post those changes on our Website so that our users and customers a re always aware of our data protec tion practices. For significant material changes o r, where required by the applicable law, we may seek your consent. If you disagree with the changes to the privacy policy, you should cease using the Website.

14.3 **Repurposing of PD.** If at any time we decide to disclose or use your PD in a method different from that specified at the time it was collected, we will provide advance notice by email (if we have it) and, if necessary seek your consent.

14.4 **When you use our website**, we share information that we collect from you, such as your email (in hashed form), IP address or information about your browser or operating system, with our partner/service provider, LiveRamp Inc**. LiveRamp returns an online identification code** that we may store in our first-party cookie for our use in online and cross-channel advertising and it may be shared with advertising companies to enable interest-based and targeted advertising. To opt-out of this use, please click here (https://liveramp.com/opt_out/).

15. Contact Us

If you have any questions about our privacy policy or would like to exercise your rights, please contact us using the following contact details:

Company: Landocs Ventures LTD

Address: Hasaham 30, Petah tiqwa, 49517 Israel

Email address: https://www.playeuchre-online.com/contact.html

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