Roblox Privacy and Cookie Policy

Effective Date: November 1, 2026

Summary of Recent Changes

We are updating our Roblox Privacy and Cookie Policy, effective November 1, 2026, to reflect certain changes we are making on Roblox.

Here's a high-level summary of the changes we are making:

- We added language describing regional variation for access to certain features.
- We added information about data collection from researchers.
- We added language describing our practices for sharing information with authorities.

1. ▼ Welcome to the Roblox Privacy Policy

   ▼ Is this Privacy Policy for you?

   If you make or play games in Roblox experiences, this Privacy Policy is for you, whatever your age and wherever you live. It's also for parents or guardians of users under 13 years old. This Policy covers the Roblox Services.

   ▼ What is in this Privacy Policy?

   This policy describes the rights you have regarding your Personal Information. It explains that you can control what happens to the information that can identify you - like your name, where you live and your email address. In this Privacy Policy, we'll also tell you when and how we use your information about you – including how we collect, record, organize, store and share it. Depending on where you live, you may have different rights or choices for managing your Personal Information, which this Policy will describe later on. In the event of a conflict between the information in Sections 1-5 of this Policy and the location-specific information in Section 7, the information in Section 7 shall prevail.

   ▼ Where does this Privacy Policy apply?

   If you're using Roblox, you're in the right place. Here's where you can learn about keeping your information safe. Using Roblox includes using:

   - websites with a roblox.com address
   - our mobile, virtual reality and console apps
   - the Roblox Player and the Roblox Studio
   - Other Roblox features described in this policy

   But if you leave our services, this Privacy Policy no longer applies. We're not responsible for what you see on other websites or apps or for their privacy policies, even if you've linked to them

from our website or app. When you go to another site or app, we may show you a message telling you that you're leaving Roblox.

To reach us with questions or requests regarding your Personal Information, our information about how to contact us is included below.

You can reach Roblox electronically by submitting a question through our Customer Support Form. If you're under 13 years old, please have your parent or guardian fill out the form.

US:
Phone: (888) 858 - BLOX
Write to us at:
Roblox Corporation
Attn: Roblox Privacy Manager
Address: 3150 S. Delaware St.
San Mateo, California, 94403
privacy@roblox.com

EEA, UK or Switzerland:
If you're in the European Economic Area (EEA), the United Kingdom, or Switzerland: contact roblox@gdpr-rep.com (Our representative according to Articles 27 EU and UK GDPR in the European Union)
EEA:
DP-Dock GmbH
Attn: Roblox Corporation
Ballindamm 39 / Ecke Jungfernstieg
20095 Hamburg, Germany

UK:
DP Data Protection Services UK Ltd.
Attn: Roblox Corporation
16 Great Queen Street
Covent Garden, London, WC2B 5AH, United Kingdom

Our data protection officer in the EU according to Art. 37 GDPR can be reached via:
DP Dock DPO Services GmbH
- Roblox
Grüffkamp 10
24159 Kiel, Germany
roblox@dp-officer.com

If you're in Brazil, contact our Brazilian Data Protection Officer by emailing dpo.roblox@leonardi.adv.br.

If you're in Korea, more information is located in the Privacy Policy Addendum for Users in Republic of Korea.

If you're in the United States, additional rules may apply depending on the state you live in. To learn more about the rights available to you under US state laws please visit the US State Privacy Policy Addendum.

Before moving on to the rest of the Privacy Policy, when you see certain terms in this Policy, some of them have specific meanings.

- "Children" or "Child" means any user under the age of 13
- "Minor" or "minor user" means a user of the Services who is under the legal age of majority in their jurisdiction or state of residence
- "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
- "Platform" means our Roblox platform, the ultimate virtual universe where imagination rules
- "Privacy Policy" or "Policy" means this Roblox Privacy Policy
- "Processing" means any operation which is performed on Personal Information, such as collecting, recording, organizing, structuring, storing, adapting or making any kind of disclosure or other use
- "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. It includes websites on the roblox.com domain, our Roblox mobile, virtual reality and consoles, 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

In the event of a material or perceived conflict between the English version of this Policy and translations into other languages, the English version shall control.

2. ▼ Are you Under 13 or responsible for an under-13-year-old?

If you're under 13 years old, your access to certain features will be restricted in the interest of protecting your Personal Information. Roblox is especially committed to protecting the privacy of children. This part of the privacy policy is just for you.

▼ First, get the go-ahead

If you're under 13 years old, please get permission from your parent or guardian to use Roblox. You shouldn't use our Services without their go-ahead.

▼ Set limits

No matter how old you are, Roblox communication settings allow you to control who can interact with you, for example, by only allowing interactions with friends or not allowing any interactions at all. You can also restrict your account, which turns off chat and public commenting and limits an account to certain filtered experiences on Roblox.

Parents and guardians – we recommend you supervise your child whenever they're interacting on Roblox. We've got some tools to help – you can learn about Roblox's safety features here.

▼ Age-appropriate privacy settings

Depending on your age and where you live, we'll automatically set your account to have stronger privacy settings. For young users, some features like personalized advertising and alerts are disabled. As you get older, you will be able to enable additional features that are appropriate for older users (though we won't personalize ads until you're 18).

▼ Information we collect if you're under 13 years old

If you're under 13 years old and create an account, we ask for some information (which is non-personal information, as defined by COPPA) to let you use Roblox.

We'll collect:

- your username (required). We need this to create your account and run the Roblox Service. We don't use your username to identify you outside of Roblox
- your password (required). We need this to log you in to your account and to run the Roblox Service
- your date of birth (required). We'll use this information to make sure your account has certain default settings intended for your age
- your gender (optional). We will use this information to customize your experience

For additional account security, authentication, and to enable parental controls, you have the option to provide a parent's or guardian's email address in account settings or during logout. Children are encouraged to provide a parent's email address, but are not required to do so to create an account. Parent email addresses are collected for authentication, for the security and integrity of your account and the Roblox platform, and for customer care communications. We may use your parent's email address to log you in. We may also use your parent's email address to communicate with them about your account, or to enable your parent to link their account to yours. A linked parent account will give your parent access to parental controls that permit them to manage your personal information, account settings, and help safeguard your experience on Roblox.

▼ Internal operations

When children sign up for Roblox, we also collect certain types of personal information called persistent identifiers for internal operations and to provide you and other users with Services. Persistent identifiers are data like IP Address and unique device identifiers that are required for you to be able to connect your device to Roblox. Persistent identifiers can be used to recognize you, your device, or your household device. Roblox collects persistent identifiers and the information we ask you for when you sign up for the following internal operations:

- Maintaining or analyzing the functioning of Roblox;
- Performing network communications;
- Authenticating users of, or personalizing the content on, Roblox;
- Serving contextual advertising, including capping the frequency of ads;
- Protecting the security or integrity of Roblox;
- Ensuring legal or regulatory compliance.

Roblox implements technical, contractual, and other measures to ensure that persistent identifiers are not used for purposes other than those listed above.

▼ Service providers

Roblox relies on service providers to support the internal operations described above. In some cases, these entities may process persistent identifiers from users. Service providers' processing of persistent identifiers to support these internal operations is subject to contractual requirements and other measures to protect the security, confidentiality, and integrity of the information.

▼ We don't want more Personal Information

If you're under 13 years old, we will only ask you to tell us the information we need to set up or protect your account. If you give us more of your Personal Information, we will:

- delete any additional Personal Information we've collected from you (unless the law requires us to keep it),
- cancel your account, or
- turn on age-appropriate protections on your account

When users publish anything in our public and comment areas (for example, chat, forums, group walls, personal posts), we filter it and remove:

- Personal Information like addresses, emails, phone numbers
- attempts at phishing (this is when someone tries to trick you into giving out Personal Information)
- offensive words, adult or suggestive content

To provide the filtering above, we use human and automated checking to the best of our ability based on available technology – but like all filtering technology, these systems aren't 100% effective.

▼ Data retention

Roblox maintains a retention policy designed to limit data retention to what is reasonably necessary to fulfill the specific purposes for which we collected your information and to prevent persistent identifiers from being retained indefinitely. In addition to a retention policy, Roblox employs measures including access controls, purpose-based tagging, employee training, and data segregation to manage the data we process. Roblox may retain the persistent identifiers that we collect from you for different periods of time based on our specific business needs, which include:

Providing the Roblox Services, including account maintenance and security

Roblox processes persistent identifiers about users to provide its services. In order to maintain your account (e.g., remember your account's configuration and activity history), Roblox stores persistent identifiers for the amount of time you have an account. When you delete your account, Roblox initiates permanent deletion of data in our systems. For safety and security purposes (e.g., bot prevention), Roblox may process persistent identifiers for up to two years after account deletion.

Age Assurance

Roblox may collect additional information about you, including images such as a live selfie, to perform age checks. We use age checks to determine whether you are old enough to access certain features.. When we perform an age check, we use a technology called facial age estimation, where we analyze your selfie to estimate your age without identifying who you are. After we complete facial age estimation, your selfie is deleted and your account age may be updated. Younger users may not be eligible for other types of age assurance like ID verification, which involve biometric processing. You can learn more about Roblox's practices in the Roblox Facial Media Capture Policy.

Linking to Parent Accounts

If you provide Roblox with your parent's email for the purposes of establishing a parental account, Roblox deletes your parent's email within 7 days if your parent does not complete the linking process.

Meeting Legal Obligations

Roblox may also retain information for longer periods if we are required to do so for legal or regulatory compliance.

▼ Parent Rights, Controls, and Support

You can request that Roblox make changes to your child's account or allow you to review, delete, or prevent the further collection or use of Personal Information from you or your child. To make a request, please fill out our Customer Support Form.

We comply with the Children's Online Privacy Protection Act ("COPPA"). COPPA affords parents the right to:

- Access your child's information and correct it
- Request that Roblox delete your child's information (If you ask us to do this, we may need to close their account because some information is necessary for Roblox's service)
- Request that Roblox stop using your child's information and withdraw any consent you previously granted
- When providing consent, receive direct notice of Roblox's data notices.

To exercise these rights, Roblox may require you to take action or provide additional information so we can verify your request, such as linking your account to your child's account.

To learn more about COPPA, you can visit the US Federal Trade Commission's COPPA website: https://www.ftc.gov/news-events/topics/protecting-consumer-privacy-security/kids-privacy-coppa

You can also learn more about COPPA by looking at this simple guide from the kidSAFE Seal Program – www.kidsafeseal.com/knowaboutcoppa.html

3. ▼ When we collect your information

▼ Setting up a Roblox account

Your first step to joining a Roblox experience is to set up a Roblox account. We'll ask you to create a unique username and password so you can log into your account and access features on Roblox. We also ask you for your birthday and gender (gender is optional) so we can customize your experience on Roblox. Eligible users may set their account's display name to contain certain Personal Information.

▼ Three key rules for signing up:

1. Do not use your own name or other Personal Information in your username.
2. Do not pick a password that's easy to guess.
3. You may share your password with your parent or guardian, but do not share it with others.

We don't use your username to identify you outside of your activity on Roblox.

▼ Why we ask you for an email address:

Once you have an account, you can add your email address (or your parents' or guardians' email address if you are under 13) in case you need to reset your password.

We might ask for your email to verify your identity or enable additional features. The main reason we need an email address is for security because it is how we check to make sure accounts are authentic. You can change your email address anytime you want – if an email address is changed, we'll send a notification email to the address that you used before.

If you have a 13+ account and change your birthday to indicate you are under age 13, Roblox will save a hash of your email address and any email addresses previously collected from you. This hash cannot be reconstructed back into your email address or used to contact you, and will only be used to authenticate you in the future.

▼ Sharing your phone number

If you choose to give a phone number, we'll send you a text message asking you to confirm your number before you can log in. You must be 13 or older to add a phone number. We will use your phone number for security and account access, including to recover a lost or forgotten password, access a feature, or log in via mobile. You authorize your wireless carrier to use or disclose information about your account and your wireless device, if available, to Roblox or its service provider for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud.

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

▼ Purchases on Roblox

You can buy Robux or premium subscriptions and choose how to pay from our available payment methods. When you pay, you (or your parent or guardian if you're under 13) will have to give billing information, including Personal Information such as:

- Name of the person responsible for buying Robux

- Their billing address and contact details, like email or phone number
- credit card or other payment information

Our payment processors (for example, PayPal) manage the transactions, which are subject to their terms and conditions and privacy policies. Their policies will explain what Personal Information they keep and use. For example, they might keep and use your billing information, transaction details, and purchase history so that they can sort out any billing problems or inquiries. Roblox receives certain information about purchases in order to fulfill our legal obligations and support the integrity of our platform. Roblox may also collect your billing address for payment and integrity purposes.

You can choose to save your billing information with one of our payment processors to make future purchases easier, in that case, Roblox does not store or have access to your full saved billing information. If you purchase Robux on behalf of another Roblox user, we collect contact information, such as email or phone number, in order to communicate with you about the transaction.

▼ Posting content

You can post comments, messages, or other content on Roblox through chats, forums, group walls, personal posts, or other features. Users who are old enough can also use audio features on Roblox. Content you post, including your chat or audio, may be captured or shared by other users. Our voice to text chat feature briefly collects your audio recording to fulfill your request, then immediately deletes it from our servers. We monitor what you say and write to check that it meets our Community Standards and complies with our Terms of Use. If we find that the content doesn't meet our standards, for example, if we believe that it is inappropriate, includes Personal Information, or is not suitable for users to have on Roblox, we have the right to change or remove it. Where the law allows us to, we may use the content you and other users have posted for training or to help us to improve the way we filter content on our platform. Our aim is to increase safety on our platform. We also may use this data to help us provide a better experience on Roblox and to respond to requests about your account from you or your parent or legal guardian.

▼ Asking questions or getting technical support

We collect your email address (or your parents' or guardians' email address if you are under 13), username, and any other details you give when you:

- contact customer support
- report a problem
- ask for technical support
- ask us questions or give us comments

We use this information to answer your questions and to give you the support or help you ask for. For users under 13, we communicate with your parent or guardian when sending our

responses. We retain records of technical support questions for a limited time for internal use only, such as to answer additional questions about your account.

▼ Using Roblox features

We may use Personal Information when you use certain Roblox features. To provide access to certain features, we may use your email address and other information you provide to us, such as your verified date of birth. Depending on your jurisdiction, you may need to be 13 or older to access these features, and some features may not be available everywhere.

▼ Social Media Links (users 13 and older)

You add links to your other social profiles on your Roblox account. This allows you to share these links with other users. You control who can see the Social Media links associated with your account.

When you use these features:

- we may be able to see information about your social media accounts.

If you use your Roblox ID to sign in to a non-Roblox website or service, and later delete your Roblox account, you may lose access to that website or service.

▼ Audio features (users 13 and older)

If you use Roblox's audio features, we will monitor, collect, use, and store audio captured through your device:

- to enable voice chat,
- to make our voice-related services safer, including to detect and combat abuse and other harmful activity on our Services,
- in accordance with applicable law, to inform training and product improvement, and
- in connection with screen recordings that Creators and Users produce through the Services.

For more information about laws that apply in your region, please visit Section 7 of this policy.

▼ Location-based Services (users 13 and older)

You can choose to use location-based Services if you're 13 or older. If you agree, we may collect and track geolocation information so that we can offer Services that depend on us knowing where you are.

We collect this information by using an identifier on your device or browser so that we can recognize you each time you return. To stop us collecting your location information, you can update your device settings, stop using the Service, or uninstall our mobile apps.

▼ Joining on a VR platform

If you join our experiences on a VR platform, we collect your physical movement information so that we can use it in the experience. This information is only used to provide the experience.We do not store this information.

▼ Camera-enabled features and uploads (users 13 and older)

If you use Roblox features that require the use of your camera or that enable you to upload content that contains your Personal Information, including photos, we will collect, process, and store that content to accomplish the purpose of the feature, including processing the content for safety purposes. Video used to generate animation key frames is processed on your device and is not shared with Roblox or any third parties. For more information, please refer to the Roblox Facial Animation Privacy Notice. For information about how Roblox uses ID Verification, please refer to the Roblox Facial Media Capture Privacy Notice.

▼ Contact Importer (users 13 and older)

If you opt-in to the Contact Importer feature, you will share the first and last names and phone numbers of your contacts in your address book on your mobile phone with Roblox. This feature helps connect with your friends on our Service. If you use the 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. Our Contact Importer feature is only available if you are 13 or older and may not be available in certain locations.

▼ Creator Events (users 13 and older)

If you join a virtual event hosted by a Creator, data such as your username, email, and Roblox user ID may be shared with the company that hosts the events. This is done to allow you to log in to the experience. Your activity during a Creator Event is subject to the third party platform's privacy policy as well as the Roblox Community Standards. Creator events are only available if you are 13 or older.

▼ Interacting with our experiences

To improve your experience and support our safety efforts, we collect information about how you interact with the Services and we connect this information with your account. For example, we may:

- collect information from your game state to detect violations of our Terms and to improve our ability to detect such violations.
- collect information about your behavior when you interact with your device for security and safety purposes
- collect information about the games you are playing to give you similar recommendations

- share information like your username and transaction details to the UGC creator or subsequent owners, if you acquire a limited item if you purchase, share, trade, or otherwise engage in a transaction involving UGC,
- collect information from your device through cookies - see “Cookies and Similar Technologies”.

▼ Subscribing to other features (users 13 and older)

When you subscribe to other features or activities that are available to users 13 years old or older, we’ll set out what information is collected and how we intend to use it when the information is collected.

▼ Competitions, promotions and research

▼ Taking part in competitions or promotions

If you take part in competitions or promotions, for example, contests, sweepstakes, giveaways or prize draws, those activities may require contact information such as your name, email, or phone number, to be eligible for discounts or prizes. If you receive a gift card provided by a third party provider, certain contact information may be shared with the provider and used in accordance with this Policy and the terms listed on the provider’s website. In some places in the world, the law requires us to publicly share information about the winners.

▼ Taking part in research

If you choose to participate in research or surveys, 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.

▼ Advertising

We process your Personal Information to display ads on Roblox. Specifically, we use information we collect to decide which ads to show you on Roblox.

Roblox also may work with partners to directly show you ads on Roblox.

Users under 18 years old will see only nonpersonalized ads. Users 18 years old and older will see personalized ads on Roblox (with consent, where required). If you are 18 or older, you can control whether you see personalized ads through your Roblox settings. Where available, you may also use the global privacy control (“GPC”) in your browser to automatically communicate your opt-out preferences to us. If our site detects a GPC signal, we will interpret it as either a Do Not Sell request or a request to limit the sale or sharing of personal information for targeted advertising depending on the law applicable to your jurisdiction.

If you choose to publish ads on Roblox, we collect additional information from you such as your name, email, address, financial information, business and/or tax information. The purpose of collecting this information is to provide you with an ad account, onboard you to the relevant ad program, send you invoices or information related to payment, and comply with applicable laws, including tax laws.

▼ If you're a developer or creator

To take part in the Roblox Developer Exchange Program, you must give us 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. This feature is only available to users who are 13 or over. For more information, please visit our Developer Exchange Terms of Use.

▼ Other purposes for collecting your information

We also use Personal Information for these general purposes, as permitted by law, in addition to the purposes listed above:

To let you manage your account and our services

- To allow you to manage your Roblox account or update your settings
- To communicate with you about our Services

To make things better for you

- To operate, maintain, personalize, and improve our Service
- To research relevant technologies
- To provide technical support or customer service

To protect you by keeping our platform safe and secure

- To detect security issues, protect against malicious, deceptive or illegal activity, and prosecute anyone responsible for that activity
- To find and fix errors or bugs
- To give you access to features or limit your access to Roblox, as appropriate
- To protect our or our users' integrity, safety or security

To comply with the law and our policies

- To audit interactions and transactions, and carry out any other compliance tasks
- To comply with the law and our own Terms of Use, or any other restrictions we've put on your use of the Service

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.

▼ Cookies and similar technologies

▼ Information collected through cookies

Like most websites, we use cookies and other standard internet technologies to help us make our services better.

Cookies

A cookie is a text file that's put on your computer or device when you visit a website. It lets the website remember what you do and any settings you choose (e.g., login information, language, font size). Cookies make your experience more convenient – for example, if the cookie remembers your log-in details, you won't have to enter them again each time you visit the site. Some cookies last longer than others:

- Session cookies are deleted each time you close the browser
- Persistent cookies stay on the device for a defined period of time.

A cookie set by the owner of the web server you are visiting is called a first-party cookie and cookies set by owners of other domains are called third-party cookies.

Pixel Tags/Web Beacons

A pixel tag or web beacon is a piece of code that tells its owner what you do on a web page. Pixel tags provide information like which web pages you visited or which ads you clicked on.

▼ How we use cookies

We use technology like cookies to recognize you and customize your experience. We and any third-parties might use these technologies whenever you visit our sites or use our Services.

We collect information about the devices and software you use, for example:

- the type of browser or device
- the website or source that linked or referred you to our services
- your IP address, device ID or other identifier that identifies your computer or mobile device – this cookie is not deleted when you close your browser
- the operating system of your computer or device

These technologies allow us to:

- record and keep your preferences, account settings, and certain login information (for your convenience, e.g. to prevent you from needing to choose settings every time you visit, and security)
- collect information about how you use the Services, for example, how you downloaded our app or where you downloaded it from
- collect information on how software is used on your mobile device
- collect information about what features you use and how well our services work
- identify any suspicious activities so we can try to protect users from payment fraud and other inappropriate activities
- collect demographic information (eg, age, location, etc)
- perform similar functions.

We use cookies or similar technologies only for the purposes given in this privacy policy.

Your cookie rights in the EEA

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. For more information, see Section 7 below.

▼ Your cookie choices

For Roblox.com, 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 you can change your browser settings so that cookies are not accepted or you are warned before a cookie is set.

Use information from browser companies to learn more about how they manage cookies:

Google Chrome: https://support.google.com/chrome/answer/95647?hl=en-GB,
Microsoft Edge: https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09,
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,
Opera: https://www.opera.com/help.
You can also learn more about cookies by visiting https://www.allaboutcookies.org/, which also tells you how to block or delete cookies that are already on your device.

By blocking or deleting cookies used, you might limit your experience of the Service. You might not be able to log in or experience the Roblox.

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. For more details see Section 7 below.

▼ To stop companies from tracking you on their websites
You can ask us or a third party to disable advertising-related tracking on our websites. To disable this tracking, we or the third party may need to set an opt-out cookie on your browser. You may

need to change your browser settings to accept cookies if you want to fully disable advertising-related tracking. Please note that our Services do not respond to Do Not Track (DNT) signals.

▼ On our corporate websites or in job applications

The parts of this privacy policy that are about Roblox platform features or give information about users under 13 years old don't apply to the corporate websites.

If you contact us about job opportunities, we may ask for your name, email address and employment details. Or you may send us a CV or job application with this information. We have the right to use this information to send you corporate-related information to you or respond to your job application. If you engage with Roblox in an immersive space for prospective employees, such as the Roblox Career Center, such a space may be recorded in order to provide the experience.

If you are a researcher contacting Roblox for access to data or information about the company, Roblox will collect information required to contact you and verify your request.

Our corporate websites give general company information to any user that visits them – they use the domain names, corp.roblox.com, blog.roblox.com, and their subdomains. On these sites, we give information about the corporate side of Roblox, press information, career information, and other general audience information. Our corporate websites do not offer any experiences.

4. ▼ When we share your information

▼ We may share Personal Information where necessary

▼ When other companies need Personal Information to provide a service on our behalf

We may share your information, including Personal Information, with other companies (known as third-party agents, contractors, or service providers). We hire these companies to perform services for us. These companies are only allowed to use the information we share to complete the relevant tasks. They are not allowed to use the information we share for any other purpose, including selling Personal Information. We make sure that all companies that we share information with are capable of looking after the information properly. Personal Information collected through the SMS program, won't be shared, sold or rented to third parties.

Here are examples of the services that we might rely on other companies to provide, and examples of the companies that we are likely to share information with.

- Account integrity and security services (e.g., Persona);
- Analytics services (e.g., Google LLC);
- User acquisition services (e.g., AppsFlyer);
- Community filtering and moderation services;
- Customer support services;

- Surveys and promotions (e.g., Reach3);
- Billing and payment services (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Playstation, Meta Quest, Xsolla)
- Hosting and content delivery services (eg, AWS, Equinix, CenturyLink, YouTube, Vimeo).

▼ When creators need Personal Information to improve your experience

The creators of the experiences you use or content you interact with may have access to your username, display name, user ID, game metrics, UGC transaction details, and your regional location (which we base on your IP address). We do not share your IP address with the creators.

We provide creators with the regional location of players to determine their player base and make sure their experiences meet the legal requirements of the country you live in.

▼ For legal reasons or to help prevent a crime

We may share your Personal Information if:

- necessary to comply with a judicial proceeding, court order, or other legal process served on Roblox
- law enforcement agencies, regulators, or other public agencies (including schools or children's services) request that we share it
- we believe that disclosing the information may prevent a crime
- we believe it is necessary to protect our legal rights or the legal rights of others
- such sharing is in response to legal orders or judicial process issued by courts or competent authorities in jurisdictions where Roblox operates or offers services, including (but not limited to) European Production Orders or European Preservation Orders issued under Regulation (EU) 2023/1543, Orders issued under Marco Civil da Internet (Law no. 12,965/2014), or equivalent orders issued under applicable law.

We may also share the contents of your communications as permitted or required by law:

- to law enforcement or judicial authorities to address a threat to life or safety of a person, including (but not limited to) where consistent with Roblox's obligations under the Digital Services Act, Article 18
- when required by law in response to governmental regulatory requests, such as Information notices issued under the UK Online Safety Act, European Production Orders or European Preservation Orders issued under Regulation (EU) 2023/1543, Orders issued under Marco Civil da Internet (Law no. 12,965/2014), or equivalent orders issued under applicable law
- in response to requests under laws governing online safety, such as the Australian Online Safety Act

▼ To support safety and security

We may share your Personal Information or the contents of your communications if we believe that sharing would:

- help an investigation into public safety or a violation of our Terms of Use
- protect the safety of Roblox users or others
- reduce risk to user safety or security, or if collaborating with others is necessary to protect users
- help to protect the security or integrity of our Services

▼ If we need to protect ourselves against legal responsibility

We may share your information if we believe that disclosing the information will allow us to take precautions against taking legal responsibility (liability) or to protect our rights.

▼ If there is a transfer of rights in our business e.g., if we sell our business

We may hand over rights to access your information, including Personal Information:

- as part of a merger, acquisition, sale of assets, or similar transaction
- if information is handed over as a business asset in an insolvency, bankruptcy, or receivership
- Where required by law, we will notify you and ask you to consent to such sharing.

▼ We may disclose Personal Information to third parties

▼ For Advertising Purposes

Roblox may disclose information collected from or about you with third-party advertising companies and/or advertising measurement companies to select and display advertisements to you on Roblox, or measure and improve advertising effectiveness. In accordance with applicable law, we provide our users with choices about whether data is disclosed for this purpose. Data disclosed for this purpose includes:

- Contact identifiers
- Characteristics or demographics
- Device identifiers

We also partner with third-party advertising companies such as ad server companies and ad networks to advertise Roblox on other websites and services. If you interact with content or reach Roblox through a link in an advertisement, we or our service providers may give these third-party advertising companies identifiers from your device, such as an IP address or device ID.

You can exercise choices about data processing for this purpose by visiting your account's privacy settings page. Depending on where you live, you may have additional rights that apply. For region-specific information, please visit Section 7 of this policy. We do not disclose any Personal Information from users under 18 years old for the purposes of directing personalized advertising. When you interact with an ad on Roblox, we work with partners to produce aggregated measurement information.

▼ Roblox Commerce

If you directly interact with a Commerce Provider to purchase a Commerce Product(s) on Roblox, Roblox and the Commerce Provider may need to exchange information about your purchase in order to fulfill the transaction. This involves Roblox or the Commerce Provider creating a transaction identifier that allows each party to confirm certain information about the transaction, such as whether a purchase has been completed. Any information you provide directly to the Commerce Provider in order to complete a transaction is independently collected by the Commerce Provider and will be subject to the Commerce Provider's applicable terms and policies.

▼ Researchers

In certain cases, where required by law, Roblox may provide researchers with access to information about our platform. This information in some cases may include Personal Information. Roblox will take steps to place reasonable and appropriate data protections around your Personal Information in such cases.

▼ We may share information that does not identify you

In some circumstances, we share data that doesn't identify you, for example:

- To comply with reporting requirements
- For any business or marketing purposes
- To help us and others understand how, when, and why users visit our sites and use Roblox.

We may share non-identifying data of all users regardless of their age.

▼ We're not responsible if you share your own Personal Information

Roblox takes steps to prevent users from sharing Personal Information via chats, forums, messages, or similar ways of communicating on Roblox. Remember that anyone who uses these features will be able to see information that you share in this way. We are not responsible for how your Personal Information is used if you shared it yourself.

5. ▼ Looking after your information

▼ Security measures

We have security measures that are intended to protect any Personal Information or other sensitive information under our control from loss, misuse, or alteration. Though we cannot guarantee that loss, misuse or alteration of information will never occur, we use reasonable efforts to prevent it.

Sending or storing information on the Internet is not 100% secure, so we can't guarantee the security of any information you share with us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.

▼ We'll tell you if your privacy is at risk

We may send you emails or other messages about security, privacy, and account management. If we learn about an incident that may qualify as a data breach under the law, we will notify you in accordance with the law.

▼ How long we keep your information

We may keep your Personal Information for specific purposes as long as we need it to fulfill those purposes, sometimes even if you've stopped using Roblox's Services. When we no longer require your Personal Information, we will de-identify or delete the information. Here are the reasons we may need to keep your information:

▼ For resolving problems

- We keep billing information and transaction histories so that we can resolve billing disputes or inquiries.
- We keep user account history to solve any customer service issues and to provide, improve, and develop our service.

▼ To make our services safer

- We may keep information if it will help us make our Service safer and more secure, such as to stop bad actors who try to misuse Roblox.

▼ For legal reasons

- We may keep information for legal reasons, like establishing legal defenses, conducting audits, pursuing legitimate business purposes, enforcing our agreements, exercising our rights, or complying with legal obligations.

▼ Letting other users keep your information

- Other users may keep publicly shared content and virtual items on our platform (e.g., if you create a virtual shirt and then sell it to another user, the virtual shirt will be kept on the platform because the other user now possesses it).

▼ Where we store your information

Roblox is based in the United States. We send information we collect from you to our secure servers in the U.S. where we store and use it. This storage is necessary for us to process the information.

We may also transfer information that we collect from you to our other offices and to the third parties mentioned in Section 4 of this Policy – these might be outside your region. Our agents or contractors may also use your information. The data protection laws of the U.S. or other countries may not be equivalent to those where you live.

Wherever we transfer your Personal Information, we will take reasonable steps so that your privacy rights continue to be protected. If required by applicable legislation, we rely on a valid international data transfer mechanism to enable cross-border data transfers.

6. ▼ Privacy Policy Changes and Updates

We update this Privacy Policy at times, so you should review this page regularly. We always publish the date of the latest version at the bottom of this page.
If we make any major changes, we will let you know by email (if we have your email address or a parent's or legal guardian's 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 consent or the consent of a parent or legal guardian if any of these changes involve new material uses of your Personal Information not previously disclosed in this Privacy Policy.

7. ▼ Additional information based on where you live

If you live in certain regions, you may have additional choices about your Personal Information or rights that apply to data processing. This section contains additional information based on where you live.

If you want to exercise your rights or make another request about your Personal Information, or if you want us to make another request about your Personal Information, please fill in the Customer Support Form. If you're under 13 years old, please have your parent or guardian fill out the form.

▼ If you live in the United States
If you live in the United States, please visit our US State Privacy Policy Addendum for more information.
▼ If you live in the Republic of Korea
If you're in Korea, more information is located in the Privacy Policy Addendum for Users in Republic of Korea.
▼ If you live in the European Economic Area (EEA), the United Kingdom (UK) or Switzerland
▼ Categories of Personal Information and Data Processing Purposes

In the course of visiting our websites and apps, and/or using our services and products, we may process the following Personal Information subject to the legal bases mentioned below:

▼ Setting up a Roblox account

- Username and password to create your account. The basis for processing this Personal Information is Article 6 sec. 1 sent. 1 lit. b ("performance of a contract").

- Email addresses and other information you provided us with for added verification and/or to enable certain features. The bases for processing this Personal Information 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.
- If you choose to provide a phone number, we will use the phone number for security and account access purposes, which will allow you to log in via mobile and recover a lost or forgotten password. You authorize your wireless carrier to use or disclose information about your account and your wireless device, if available, to Roblox or its service provider for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”) and f (“legitimate interest”) GDPR. We have a legitimate interest in enabling you to use our Services via your mobile device, ensuring security, and preventing fraud. Additionally, with your consent, we may use your phone number to recommend you as a friend to others using Roblox. The legal basis for friend recommendations and discoverability based on your phone number is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”).

▼ Purchases on Roblox

- Billing and payment information, when you participate in Developer Exchange or purchase Robux or premium subscriptions on behalf of yourself or another user, including your name, billing address, credit card or other payment information and billing information. You may choose to save information such as your credit card number through a third-party payment provider; in such cases the information is not stored by Roblox; it is stored with the third-party partner. If you purchase Robux on behalf of another Roblox user, we collect contact information, such as email or phone number, in order to communicate with you about the transaction. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”). We may also collect billing addresses and retain transaction details and purchase and payment history. The legal basis for processing this Personal Information is our legitimate interest in being able to perform billing and resolve inquiries, Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”).

▼ Posting content

- 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. Our voice to text chat feature briefly collects your audio recording to fulfill your request, then immediately deletes it from our servers. 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.

▼ Asking questions or getting technical support

- 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 Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract"), depending on the initial purpose for contacting our customer support.

▼ Using Roblox Features

- Social media links you add to your account. When you use these features, certain information from your social media accounts may be accessed by or shared with Roblox. The legal bases for this processing activity are Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract"). If you use your Roblox credentials to sign in to a third-party website or service, and later delete your Roblox account, you may lose access to such third-party website or service.
- When you use audio features from Roblox, we may collect, process, and store your audio recordings to enable features like voice services and make Roblox safer. We will not engage in training or product improvement with private server voice chat recordings of EEA users. The bases for processing audio data are Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract") and Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest"). With your consent, we will use voice recordings to inform training and product improvement. The basis for processing this Personal Information for training and product improvement is Article 6 sec. 1 sent. 1 lit. a GDPR ("consent").
- When you request or agree to location-based services (users 13 years old and older), we may collect and track geolocation information so that we can offer services that depend on us knowing where you are. Examples are personalizing content or personalized advertising for users 18 years old and older. We collect this information by using an identifier on your device or browser so that we can recognize you each time you return. To stop us collecting your location information, you can update your device settings, stop using the service, or uninstall our mobile apps. The basis for processing this Personal Information is Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract").
- 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. The bases for processing this Personal Information are Article 6 sec. 1 sent. 1 lit. b GDPR("performance of a contract").
- If you join a virtual event hosted by a Creator, data such as your username, email, and Roblox user ID may be shared with the third-party platform that hosts events. Such data is used to allow you to log in to the experience. Your activity during a Creator Event is subject to the third party platform's privacy policy as well as the Roblox Community Standards. The bases for

processing this Personal Information are Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”) to join an event and f GDPR(“legitimate interest”) to support the security and integrity of our service.

- Information required for additional features that require the use of your camera or upload content, including photos or videos, that contains your Personal Information. If you decide to use these features and upload content that requires the use of your camera or upload content that contains your Personal Information, we will collect, process, and store that content only for as long as needed to accomplish the purpose of the feature, AI training, and improving products. The bases for processing this Personal Information are Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”). For certain features that require the use of your camera, including for age assurance purposes, Roblox processes data on the basis of Article 6 sec.1 sent. 1 lit. c GDPR (“legal obligation”) and Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest"). For certain uploads, such as ID verification, Roblox processes biometric data you upload on the basis of consent, Article 6 sec. 1 sent. 1 lit. a GDPR or Article 9 sec. 2 lit. a GDPR (“consent”). Roblox may process the ID and live selfie you provide through ID Verification for AI training or improving products on the basis of Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest"). For more detailed information, about the specific purposes and processing activities, please refer to the Roblox Facial Animation Privacy Notice and Roblox Facial Media Capture Privacy Notice.
- Information required for 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. The bases for processing this Personal Information are Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”).
- If you opt-in to the Contact Importer feature, you share 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. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”).
- Interacting with our experiences. To improve your experience and support our safety efforts, we collect information about how you interact with the Services and we connect this information with your account. For example, we may collect information from a user's game state to detect violations of our Terms and to improve our ability to detect such violations; collect information about your behavior when you interact with your device for security and safety purposes, collect information from your search history to give you similar recommendations; share information like your username and transaction details to the UGC creator or subsequent owners, if you acquire a limited item if you purchase, share, trade, or otherwise engage in a transaction involving UGC. The bases for processing this Personal Information are Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”) and f GDPR

(“legitimate interest”). We may use data collected from your interaction with our experiences for safety or moderation purposes on the basis of Article 6 sec. 1 sent. 1 lit. f GDPR ("legitimate interest").

▼ Competitions, promotions, and research

- When you respond to or participate in voluntary research or 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. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”).
- 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”).

▼ Advertising

- We process Personal Information to personalize the ads you see on Roblox. We use information we collect and receive from partners to decide which ads to show you on Roblox. To the extent these practices involve the processing of Personal Information and displaying personalized ads, the legal basis for the processing is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”). We do not show personalized ads to users under the age of 18 on Roblox. We process Personal Information to display non-personalized ads on Roblox. To the extent these practices involve the processing of Personal Information, the legal basis for processing is Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”).
- Roblox also may work with partners to directly show you ads on Roblox. To the extent these practices involve the processing of Personal Information to display personalized ads, the legal basis for the processing is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”). To the extent these practices involve the processing of Personal Information to display non-personalized ads, the legal basis for processing is Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”).
- Roblox will process information collected from or about you to measure and improve advertising effectiveness. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”).
- To market our services on other sites and apps, for example, 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. To the extent these practices involve the processing of Personal Information, the legal basis for the processing is Article 6 sec. 1 sent. 1 lit. a GDPR (“consent”).
- If you choose to publish ads on Roblox, we collect additional information from you (such as name, email, address, financial information, business information, etc.) in order to create an ad account, onboard you to the relevant ad program, and send you invoices or information

related to payment. The basis for processing this Personal Information 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 Information is our legitimate interest in being able to resolve subsequent disputes and inquiries, Article 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”). We also collect and retain your information to comply with our legal obligations, including our obligations under tax laws. The basis for processing this Personal Information is Article 6 sec. 1 sent. 1 lit. c GDPR (“legal obligation”).

▼ If you’re a developer or creator

- 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.

▼ Other purposes for collecting your information

- We collect and process Personal Information for other legitimate purposes including the following. We collect and process data to let you manage your account and our services, to make things better for you, and to protect you by keeping our platform safe and secure. The legal basis for this processing is Article 6 sec.1 sent. 1 lit. f GDPR (“legitimate interest”). We also use data to comply with law and our policies. The legal basis for this processing is Article 6 sec.1 sent. 1 lit. b GDPR (“performance of a contract”) and Article 6 sec.1 sent. 1 lit. b GDPR (“legal obligation”).

▼ Cookies and similar technologies

- We use cookies. Some of these cookies are necessary for the basic functioning of the website and therefore cannot be deactivated. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR (“performance of a contract”) and Art. 6 sec. 1 sent. 1 lit. f GDPR (“legitimate interest”) because we have a legitimate interest to guarantee the Services’ stability and security. We will use optional 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 3 above.

▼ On our corporate websites or in job applications

- 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. If you engage with Roblox in an immersive space for prospective employees, such as the Roblox Career

Center, such a space may be recorded in order to provide the experience. For researchers requesting to work with Roblox or seeking access to Roblox data or information, we will collect information required to verify and process your request. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR (“necessary for entering into a contract with us”) and, to the extent applicable, Article 6 sec. 1 sent. 1 lit. c (“legal obligation”) GDPR.

▼ Automated Decision-Making

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 Information of Children and Parental Consent

Please note that when users under the age of 13 (for the purposes of this section, a “child”) register for the Service, their account is automatically set to privacy-protective settings by default. This means that these users will not have access to certain features, including personalized advertising, and certain types of notification alerts.

When a child creates an account on Roblox, we may process a username, password, birthdate, and gender (gender is optional). Separate from account creation, users may optionally provide a parent email address. We process this information to give the user access to the Service and to communicate with the parent about the child’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 and an invitation for the parent to review the account and update settings. 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 child’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., Persona);

- Analytics services (e.g., Google LLC);
- User Acquisition services (e.g., AppsFlyer);
- Community filtering and moderation services;
- Customer support services;
- Surveys and promotions (e.g., Reach3);
- Billing services and payment gateway providers (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Playstation, Meta Quest, Xsolla); and
- Hosting and content delivery network services (e.g., AWS, Equinix, CenturyLink, YouTube, Vimeo).

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 such that all service providers with access to Personal Information are capable of protecting the information we share with them.

Further, the creators of the experiences you use or content you interact with will have access to your username, display name, user ID, game metrics, UGC transaction details, and your regional location (which we base on your IP address). We do not share your IP address with the creators. We provide creators with the regional location of players to determine their player base and make sure their experiences meet the legal requirements of the country you live in. The legal basis for this processing activity is Article 6 sec. 1 sent. 1 lit. b GDPR ("performance of a contract"), Article 6 sec. 1 sent. 1 lit. c GDPR ("compliance with legal obligation") in compliance with the respective EEA or Member State law and lit. f GPDR ("legitimate interest"). It is the creators' legitimate interest to comply with non-EEA legal obligations.

In accordance with applicable laws, Roblox may disclose information collected from or about you with advertisers and/or advertising measurement companies to select advertisements for you, or measure and improve advertising effectiveness. The legal basis for disclosing information to third party advertising partners is Article 6 sec. 1 sent. 1 lit. a GDPR ("consent"). Data disclosed for advertising measurement purposes includes contact identifiers and device identifiers. The legal basis for this processing activity is Article 6 sec. sent. 1 lit. f GDPR ("legitimate interest").

If you directly interact with a Commerce Provider to purchase a Commerce Product(s) on Roblox, Roblox and the Commerce Provider may need to exchange information about your purchase in order to fulfill the transaction. This involves Roblox or the Commerce Provider creating a transaction identifier that allows each party to confirm certain information about the transaction, such as whether a purchase has been completed. The legal basis for data sharing required to facilitate a purchase you make through a fulfillment partner is Article 6 sec. 1 sent. 1 lit. b ("performance of a contract").

Roblox may be obligated to share information with researchers. Such information may in some cases include Personal Information about individuals. In such cases, Roblox provides the Personal Information subject to Article 6 sec. 1 sent. 1 lit. c GDPR (“compliance with legal obligation”).

▼ 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, for example, where consistent with Roblox's obligations under the Digital Services Act, Article 18 and Information notices issued under the UK Online Safety Act and any additional purposes listed in Section 4 of this policy. 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), if we believe that there is a risk to user safety or security, for legal reasons, or to prevent a crime, in accordance with Section 4 of the Roblox Privacy and Cookie Policy. The legal basis for such disclosure is Article 6 sec. 1 sent. 1 lit. c GDPR (“compliance with legal obligation”) in compliance with the respective EEA or Member State law and lit. f GDPR (“legitimate interest”). It is our legitimate interest to comply with the legal requirements of U.S. law. Further, we have a legitimate interest in these purposes.

▼ 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 so that your privacy rights continue to be protected, e.g. conclude the EU Standard Contractual Clauses with third parties.

▼ Your rights as a Data Subject

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

- Request (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;
- Request (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.
- You may (i) exercise the rights referred to above, (ii) pose any questions, or (iii) make any complaints regarding our data processing by contacting us under the contact details set out above in Sec. 1.

Further, you may 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.

▼ If you live in Brazil

▼ Categories of Personal Information and Data Processing Purposes

In the course of visiting our websites and apps, and/or using our services and products, we may process the following Personal Information:

▼ Setting up a Roblox account

- Username and password to create your account.
- Email addresses and other information you provided us with for added verification and/or to enable certain features. Roblox has a legitimate interest in providing a safe and secure Service, especially to protect children.
- If you choose to provide a phone number, we will use the phone number for security and account access purposes, which will allow you to log in via mobile and recover a lost or forgotten password. You authorize your wireless carrier to use or disclose information about your account and your wireless device, if available, to Roblox or its service provider for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud. We have a legitimate interest in enabling you to use our Services via your mobile device, ensuring security, and preventing fraud. Additionally, with your explicit and

informed consent, we may use your phone number to recommend you as a friend to others using Roblox.

▼ Purchases on Roblox

- Billing and payment information, when you participate in Developer Exchange or purchase Robux or premium subscriptions on behalf of yourself or another user, including your name, billing address, credit card or other payment information and billing information. You may choose to save information such as your credit card number through a third-party payment provider; in such cases the information is not stored by Roblox; it is stored with the third-party partner. We may also collect billing addresses and retain transaction details and purchase and payment history. If you purchase Robux on behalf of another Roblox user, we collect contact information, such as email or phone number, in order to communicate with you about the transaction.

▼ Posting content

- 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. Our voice to text chat feature briefly collects your audio recording to fulfill your request, then immediately deletes it from our servers. 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.

▼ Asking questions or getting technical support

- 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.

▼ Using Roblox Features

- Social media links you add to your account.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. If you use your Roblox credentials to sign in to a third-party website or service, and later delete your Roblox account, you may lose access to such third-party website or service.

- When you use audio features from Roblox, we may collect, process, and store your audio recording to enable voice services and make Roblox safer. We will not engage in training or

product improvement with private server voice chat recordings of Brazil users. With your consent, we will use voice recordings to inform training and product improvement.

- When you request or agree to location-based services (users 13 years old and older), we may collect and track geolocation information so that we can offer services that depend on us knowing where you are. Examples are personalizing content or personalized advertising for users 18 years old and older. We collect this information by using an identifier on your device or browser so that we can recognize you each time you return. To stop us collecting your location information, you can update your device settings, stop using the service, or uninstall our mobile apps.
- 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.
- If you join a virtual event hosted by a Creator, data such as your username, email, and Roblox user ID may be shared with the third-party platform that hosts events. Such data is used to allow you to log in to the experience. Your activity during a Creator Event is subject to the third party platform's privacy policy as well as the Roblox Community Standards.
- Information required for additional features that require the use of your camera or upload content, including photos or videos, that contains your Personal Information. If you decide to use these features and upload content, we will collect, process, and store that content to accomplish the purpose of the feature. For more information, please refer to the Roblox Facial Animation Privacy Noticeand Roblox Facial Media Capture Privacy Notice.
- Information required for 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.
- 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.
- Interacting with our experiences. To improve your experience and support our safety efforts, we collect information about how you interact with the Services and we connect this information with your account. For example, we may collect information from a user's game state to detect violations of our Terms and to improve our ability to detect such violations; collect information about your behavior when you interact with your device for security and safety purposes; collect information from your search history to give you similar recommendations; share information like your username and transaction details to the UGC creator or subsequent owners, if you acquire a limited item if you purchase, share, trade, or otherwise engage in a transaction involving UGC.

▼ Competitions, promotions, and research

- When you respond to or participate in voluntary research or 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.
- 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.

▼ Advertising

- We process Personal Information to display ads on Roblox. We use information we collect and receive from partners to decide which ads to show you on Roblox. Depending on where you live, Roblox also may work with partners to directly show you ads on Roblox. We do not show personalized ads to users under the age of 18 on Roblox.
- Roblox will process information collected from or about you to measure and improve advertising effectiveness.
- To market our services on other sites and apps, for example, 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.
- When you choose to create an Ad Account, we may collect additional information for your account (such as name, email, address, business information, etc.) in order to create an account. We may also retain transaction details and purchase and payment history.

▼ If you're a developer or creator

- 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). It is our legitimate interest to comply with the legal requirements, especially with regard to U.S. anti-money laundering laws.

▼ Other purposes for collecting your information

- Login information, which may include your IP address, device type, username, password, 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. 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, regional location information, user-generated content, contact details that you choose to provide to us, 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.

▼ Cookies and similar technologies

- We use cookies. Some of these cookies are necessary for the basic functioning of the website and therefore cannot be deactivated. We will use optional cookies only if you have previously

consented to such use. 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. In addition, you can also manage cookies using your browser settings. For further information on cookies and similar technologies see Section 3 above.

▼ On our corporate websites or in job applications

- 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. If you engage with Roblox in an immersive space for prospective employees, such as the Roblox Career Center, such a space may be recorded in order to provide the experience. We will process this information to process and respond to your job application. For researchers requesting to work with Roblox or seeking access to Roblox data or information, we will collect information required to verify and process your request.

▼ Automated Decision-Making

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 Information 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 to privacy-protective settings by default. This means that these users will not have access to certain features, including personalized advertising, and certain types of notification alerts.

When a child creates an account on Roblox, we may process a username, password, birthdate, and gender (gender is optional). Separate from account creation, users may optionally provide the user access to the Service and to communicate with the parent about the child’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 and an invitation for the parent to review their child's account and update settings. 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.

In general, we will not use or share account information (including Personal Information) from a child's account except for the permissible purposes stated in this Privacy Policy and, where applicable, only with the prior verifiable consent of a parent or legal guardian.

▼ 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., Persona);
- Analytics services (e.g., Google LLC);
- User Acquisition services (e.g., AppsFlyer);
- Community filtering and moderation services;
- Customer support services;
- Surveys and promotions (e.g., Reach3);
- Billing services and payment gateway providers (e.g., Kount, Worldpay, PayPal, Incomm, Blackhawk, Google, Apple, Amazon, Windows Store, Xbox, Playstation, Meta Quest, Xsolla); and
- Hosting and content delivery network services (e.g., AWS, Equinix, CenturyLink, YouTube, Vimeo).

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 such that all service providers with access to Personal Information are capable of protecting the information we share with them.

Further, the creators of the experiences you use or content you interact with will have access to your username, display name, user ID, game metrics, UGC transaction details, and your regional location (which we base on your IP address). We do not share your IP address with the creators. We provide creators with the regional location of players to determine their player base and make sure their experiences meet the legal requirements of the country you live in.

In accordance with applicable laws, Roblox may disclose information collected from or about you with advertisers and/or advertising measurement companies to select advertisements for you, or measure and improve advertising effectiveness. Data disclosed for this purpose includes contact identifiers and device identifiers.

If you directly interact with a Commerce Provider to purchase a Commerce Product(s) on Roblox, Roblox and the Commerce Provider may need to exchange information about your purchase in order to fulfill the transaction. This involves Roblox or the Commerce Provider creating a transaction identifier that allows each party to confirm certain information about the transaction, such as whether a purchase has been completed.

Roblox may have a legal obligation to share information with researchers. Such information may in some cases include Personal Information about individuals.

▼ 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), if we believe that there is a risk to user safety or security, for legal reasons, or to prevent a crime, in accordance with Section 4 of the Roblox Privacy and Cookie Policy.

▼ 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 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 so that we rely on a legitimate international transfer mechanism, as set out in Brazilian data protection laws.

▼ Your rights as a Data Subject

As a data subject located in Brazil, you have rights regarding your Personal Information. We provide mechanisms, as detailed below, so that you have clarity and transparency in exercising your rights. As a data subject, you have the following rights:

- Confirm whether or not we process your Personal Information
- Access your Personal Information
- Correct incomplete, inaccurate, or outdated Personal Information
- Anonymize, block or delete unnecessary, excessive Personal Information or data processed in non-compliance with LGPD
- Port your Personal Information to another service provider, upon express request and subject to our trade secrets, in accordance with the regulations of the supervisory authority
- Delete Personal Information processed under your consent if it is withdrawn, when applicable
- Request information about public and private entities with which we shared your Personal Information
- Request information about the possibility of not providing consent and about the consequences of doing so
- Withdraw your consent, where applicable
- Request information about with whom we share your Personal Information
- Object to processing activities that violates LGPD's provisions

Before responding to any of your requests, we may ask you to provide us with some information to confirm your identity. We will only respond to your request after validating your identity.

Please also note that these rights are not absolute and may not apply in certain circumstances. For example, we may continue to process and retain Personal Information regardless of your request to delete, object, block or anonymize it, to comply with legal, contractual and/or regulatory obligations, and to protect and exercise rights, including in judicial, administrative and arbitration proceedings, and as otherwise required by law. To exercise your rights or ask questions, you can contact us by completing this Customer Support Form. To appeal a decision about your privacy rights, please contact our Brazilian Data Protection Officer by emailing dpo.roblox@leonardi.adv.br, or otherwise reaching out to us as described in Section 1.

▼ Summary of Recent Changes

- We added language describing regional variation for access to certain features.
- We added information about data collection from researchers.
- We added language describing our practices for sharing information with authorities.

Effective Date: November 1, 2026
Last Updated: November 1, 2026