

# 1. Privacy

**1.1** This Privacy Policy explains how information is collected and utilized by GAMESTURE sp. z o. o. seated in ul. Grodziska 8, 60-363 POZNAŃ

**1.2** This Privacy Policy applies to the games provided by GAMESTURE sp. z o. o. (GAMESTURE, We, Our company)

**1.3** For the purposes of European data protection laws we are the data controller. If you have any concerns about privacy, please send an email to our Data Protection Officer at: **privacy@gamesture.com**

**1.4** This Privacy Policy applies to information that we collect and/or generate through the Game that we provide.

**1.5** This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy on the App Store Site. You are advised to consult this Privacy Policy regularly for any changes.

## 2. Information collection and use

### 2.1 Personal Information

We will collect Personal Data when you interact with our services such as when you:

- downloaded and install the game
- make a purchase via the stores
- submit a request for support

### 2.2 Personal Information We Collect

When you download our Game, we automatically collect certain information about your device, as your application usage, access, session times and in-app purchases, your unique device ID, hardware type, media access control ("MAC") address, international mobile equipment identity ("IMEI"), the version of your operating system ("OS"), your device name and your location (based on your Internet Protocol ("IP") address). This information is useful to us for troubleshooting and helps us understand usage trends and improve and optimize Game and your user experience, and may also be utilized for other purposes, such as interest based advertising as described elsewhere in this Policy. In addition, we create a unique user ID to track your use of our Game.

We also track your behavior in game by collecting:

- business events such as transactions made in the Game
- progression events that are used to mark a Player's progress or movement in the Game

- resource events such as the acquisition or spend of Game virtual currencies by the Player
- design events used to track Player behavior in the Game, which can refer to any aspect of the Game’s design, including, but not limited to, level or character design, bonuses, social interactions, etc.
- error events such as any errors encountered by the Player while using the Game
- Game data (such as your interactions with the game and with the other players inside the game via server log files, your player ID)

### **2.3 Use of Your Information**

GAMESTURE primary goals in using information are to create your account, provide Services to you, improve our Service, contact you, conduct marketing and research and create reports for internal use. We store information on servers via Amazon Web Services and may store information on servers and equipment in other countries.

We use information collected through our Game for purposes described in this Policy, for example, we may use your information to:

- create game accounts and allow users to play our game;
- operate and improve our Service;
- understand you and your preferences to enhance your experience and enjoyment playing our Game;
- respond to your comments and questions and provide customer service;
- provide and deliver products and services you request;
- send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by Gamesture;
- enable you to communicate with other users;
- link or combine it with other information we get from third parties, to help understand your preferences and provide you with better services.

### **2.4 Legal grounds for processing of your personal data**

We collect and process your personal data, basing on:

- your consent;
- for the purpose of execution of a contract between you and us (please refer to our Terms of Service available on our website)
- our legitimate interest.

By “legitimate interest” we understand marketing purposes, analytical purposes (to improve our apps and services, to prevent cheats in our apps) and protection of personal data. We always take into account your interests and fundamental rights and freedoms, which prevail over the “legitimate interest” as a basis of processing of personal data.

We may use the personal data we collected from you to personalize the communication to you.

**If you prefer that we do not collect and process this data you can at any time request us to cease the collection and processing of this Customer Data, see Clause 4 below on how to do this.**

### **3. Sharing Your Personal Information**

We may share your Personal Information with third parties to help us analyze the data to provide our Players the best experience that we can. We use following services:

- Game Analytics - <https://gameanalytics.com/privacy>
- Unity Analytics - <https://unity3d.com/legal/privacy-policy>
- AppsFlyer - <https://www.appsflyer.com/privacy-policy>
- Google Play Analytics - <https://play.google.com/about/privacy-security-deception>
- Facebook Ads - [https://www.facebook.com/ads/about/?entry\\_product=privacy\\_shortcuts](https://www.facebook.com/ads/about/?entry_product=privacy_shortcuts)
- Helpshift - <https://www.helpshift.com/legal/privacy/>
- Google Firebase - <https://firebase.google.com/support/privacy/>
- Google Fabric - <https://docs.fabric.io/apple/fabric/data-privacy.html> ;  
<https://docs.fabric.io/android/fabric/data-privacy.html>

The information shared with these third parties may be used for industry analysis, tracking game conversions or demographic profiling. You can check their privacy policy on additional websites provided by our partners.

When permitted by applicable law, we may also provide your information and customer information to our, business partners, advertisers or other trusted entities for the purpose of providing you with information on goods and services we believe will be of interest to you.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

Gamesture sp. z o. o. and our partners will take any reasonable actions regarding collecting and processing personal data, in a safe way using generally available technology that according to our knowledge could provide such a security and is known to be efficient and technically stable

### **4. Changing or Deleting Your Information**

Under Data Protection Laws you have certain data subject rights including the right to:

- request access to and rectification or erasure of your Personal Data;
- obtain restriction of processing or to object to processing of your personal data
- ask for a copy of your personal data to be provided to you, or a third party, in a digital format.

If you wish to exercise one of the above mentioned rights, please contact us at [privacy@gamesture.com](mailto:privacy@gamesture.com). If your Personal Data are erased or transferred to a third party, then your Account may be deactivated. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority.

## 5. Confidentiality, Security and Data Retention

While we cannot guarantee that loss, misuse or alteration to your data will not occur; we implement appropriate technical and organizational measures to prevent such occurrences. Data will be protected against, loss, misuse, or alteration by third parties. We will retain your information and Customer Data for no longer than is necessary and for the duration of the agreement with you. We retain your information for as long as your account is active or as needed to provide you Services. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Gamesture takes reasonable measures to protect your information from unauthorized access or against loss, misuse or alteration by third parties. In addition to do so we cooperate with company Grey Wizard that provides comprehensive and continuous protection against cyberattacks. It protects against DDoS threats and ensures security of web applications. Their expert knowledge supported by artificial intelligence helps to quickly detect and respond to threats of all types.

## 6. Support

We may use your email address when you contact our customer service group to contact you about your gaming experience with Gamesture. If applicable law requires that we receive your explicit consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your explicit consent. If you decide at any time that you no longer wish to receive such communications from us, you may contact us on [privacy@gamesture.com](mailto:privacy@gamesture.com)

We may occasionally send you push notifications through our mobile applications to send you game updates, high scores and other service related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off at the device level through your settings.

## 7. Children

The Services are intended for general audiences and Gamesture sp. z o.o. does not knowingly collect any Personal Data from children.

If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [privacy@gamesture.com](mailto:privacy@gamesture.com). We will delete such information from our files within a reasonable period of time

## 8. Updates

We are entitled to change or update this privacy policy whenever we find it necessary. In case of changes, we will make this Policy available in the internet. Any changes to this policy will become binding within 30 days from publishing it. If you do not agree with the changes, we will ask you to cease to use our apps and services.

## 9. Contact Information of Data Controller

Gamesture sp. z o. o.

Grodziska 8, 60-363 Poznań, Poland

If you have any questions or concerns about our data privacy practices, or if you have any requests for resolving issues with your personal information, please contact us at [privacy@gamesture.com](mailto:privacy@gamesture.com)