

Privacy policy - *Last updated October, 9th 2020*

HC Tech is an entertainment company specialized in the mobile environment. We create and publish free mobile games and applications that aim to entertain, inform and connect people by leveraging global creative power.

The purpose of this policy is to provide you with all the important information and explanations about how and why some of your data may be collected and processed by HC Tech when you use one of our applications or browse on our website. This privacy policy governs and details the main principles that HC Tech applies to the data we collect and process to:

- (i) develop and publish mobile apps
- (ii) serve advertising that are tailored to the interests of users and
- (iii) run our corporate website

This policy also aims to remind you about your rights and to provide you with all the elements you need to exercise them.

Should you have any questions related to this policy or our practices around privacy and data protection in general, please don't hesitate to contact us at "hcgamesstudio@gmail.com".

HC Tech apps and games

Why does HC Tech collect data from its apps and games?

When you install and use HC Tech mobile applications, we can collect and process some of your data for different legitimate purposes.

You will find below explanations regarding the reasons why HC Tech may collect data and the legal bases HC Tech relies on in each case.

HC Tech collects data:

- To provide you with the services you asked for (e.g., knowing that you completed the first level to allow access to the second one)
 - Legal basis – such data processing is strictly necessary for the service(s) asked
- To run analytics and understand how users interact with our product and services in order to continuously improve it (e.g. identifying that a feature is annoying for users or that a level is too difficult for most gamers)
 - Legal basis - Express consent. HC Tech only processes or shares personal data collected through HC Tech apps for analytics purposes once you express your consent through the pop-up notice included in our apps.
- To serve advertising tailored to the preference and interests of our users and allow HC Tech to continue to provide free services and products
 - Legal basis – Express consent. HC Tech only processes or shares personal data collected through HC Tech apps for personalized advertising purposes once you express your consent through the pop-up notice included in one of our apps.

For all data processing activities that rely on users' consent, you can withdraw your consent at any time from the "settings" page in our various applications.

Please only note that in the case where you withdraw your consent or where you refuse to consent in the first place, you will still be served with advertising but that may be less relevant to you as it will not be tailored to your interests.

What data does HC Tech collect from its apps and games?

For all the purposes listed above the data that HC Tech collect is limited to:

- The apps you are using
- Your IP address
- Your Mobile Advertising ID (Apple IDFA or Google AAID - which are technical identifiers developed by mobile operating systems for advertising purposes which remain under your control and can be reset or erased at any time in through your device settings)
- Technical information about the device you use and your connection (user agent, type of connection, timestamp)
- Data pertaining to your activities on our applications and notably the way in which you interact with our applications (for instance, how and when you use our applications) and with the advertising served in our applications (for instance, number of ads served, potential clicks)

With who may your data be shared & why?

HC Tech does not share your personal data with third parties without your prior consent.

When you consent to the collection of data for advertising and analytics purpose, we may share the data listed above with the following categories of recipients:

- Ad Partners: that allow us to monetize the ad inventory of our apps and provide users with free products and services.
Those partners usually collect data via their own tools (Software Development Kits or “SDK”). You will find a list of our partners implementing advertising SDKs through our applications and the privacy policies of their services that describe their practices and allow you to exercise your rights directly toward them hereafter:
 - Adcolony -
<https://www.adcolony.com/privacy-policy/>
 - Applovin -
<https://www.applovin.com/privacy/>
 - Criteo -
<https://www.criteo.com/privacy/>

- Facebook -
 - <https://www.facebook.com/about/privacy>
- Flyer -
 - <https://www.flyer.com/privacy-policy/>
- Google -
 - <https://policies.google.com/privacy>
- Inmobi -
 - <https://www.inmobi.com/privacy-policy/>
- Ironsource -
 - <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
- Mintegral -
 - <https://www.mintegral.com/en/privacy/>
- Mopub -
 - <https://www.mopub.com/legal/privacy/>
- Oath -
 - <https://policies.oath.com/in/en/oath/privacy/>
- Ogury -
 - <https://ogury.com/privacy-policy/>
- Tapjoy -
 - <https://www.tapjoy.com/legal/tapjoy-users/#privacy-policy>
- Vungle -
 - <https://vungle.com/privacy/>
- Analytic companies: that provide us with tools and technologies that allow us to better understand how users interact with our services and will help us improve it. Those partners also usually collect data via their own SDKs. You will find a list of our partners implementing analytical SDKs through our applications hereafter:
 - Adjust -
 - <https://www.adjust.com/terms/privacy-policy/>
 - GameAnalytics -
 - <https://policies.google.com/privacy>
 - Google -
 - <https://policies.google.com/privacy>
 - Mixpanel -
 - <https://mixpanel.com/legal/privacy-policy/>

- Tenjin -
- <https://www.tenjin.io/privacy/>
- Authorities: only to the extent we are obliged to by applicable laws and regulations.

How long does HC Tech keep your data?

Personal data collected, received and processed for the purposes described in this policy is not kept longer than necessary for the purposes described above in this section.

In all cases, HC Tech does not retain such data for more than 13 months.

Children data

HC Tech never knowingly or willingly collects any personal data concerning children under 16 years of age.

International transfers

Some of the partners and processors referred to in this policy are located outside of the European Union.

In such case, we ensure that:

- the personal data is transferred to countries recognized as offering an equivalent level of protection or,
- Personal data is transferred to certified entities under the Privacy Shield or,
- For personal data transferred outside of countries recognized by the European Commission as having a sufficient level of protection, any of the mechanisms offering appropriate guarantees is used, for which provision is made by

applicable regulations, and in particular the adoption of the standard contractual clauses of the European Commission.

What rights do you have?

Consent withdrawal and opt-out of sale of information

You can change your consent status at any time from the Privacy Settings available in HC Tech mobile games and applications.

Please note that if HC Tech does not sell the personal information of its users, we may share it with third parties such as analytics and advertising companies in order to improve and personalize your experience and adapt the content and ads of our services.

Adjusting your consent settings within HC Tech apps and games, will allow you to block the collection of data for these purposes and will de facto prevent the sharing of information with our analytics and/or advertising partners.

Access right

Upon request, HC Tech will provide you with information about whether we hold any of your personal information. You may access or request deletion of your personal information directly in HC Tech mobile apps or by contacting us at “hcgamesstudio@gmail.com”. We will respond to your request within a reasonable timeframe.

Rectification and erasure

You may request HC Tech the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data. You may also request HC Tech

to erase without undue delay your personal data when it is no longer necessary for HC Tech to retain such data.

In order for your data to be erased or rendered inaccessible you can either:

- reset your mobile advertising identifier (IDFA on iOS, GAAID on Android) or activate “Limit Ad Tracking” in your device’ settings in order to make previously collected data non linkable to you or your device anymore and limit further data collection if you choose to enable the “Limit Ad Tracking” option
- contact us at “hcgamesstudio@gmail.com”

Portability

Upon request, HC Tech will provide you with the personal data that you provided to us and, if possible, will communicate this information directly to another data controller of your choice in a portable format when the processing is based on consent or contract.

Right to lodge a complaint

You may lodge a complaint with a Data Protection Authority. HC Tech being a Indian company, our supervisory authority is in INDIA

<https://www.meity.gov.in/>

Contact

“hcgamesstudio@gmail.com”