

Privacy Policy

Last updated 10.01.2023

ElinaGs ("we" or "us" or "our") respects the privacy of our users ("user" or "you"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our <https://playducky.com/> Service (the "Service"). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE WEBSITE.

From the data protection perspective, we are a data controller for the information collected through the Service. You can contact us at:

Registered address: ul. Zur Uram, 32, Kazan, Russia

Contact email address: elina.games.studio@gmail.com

We will alert you about any changes by updating the "Last Updated" date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. However, we will endeavor to provide you with an announcement about any significant changes.

You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Service after the date such revised Privacy Policy is posted.

TABLE OF CONTENTS:

- Information we collect from you;
- Use of your information;
- Legal basis for processing;
- Disclosure of your information;
- Tracking technologies;
- Security of your information;
- How long we keep your personal data;
- Your rights;
- Policy for children;
- Contact us.

INFORMATION WE COLLECT FROM YOU

Contact information (HC game test request form)

To share with us your new casual games ideas and send us a gameplay video you want us to assess, you will be asked to provide us with your name, email address, gameplay video link, game name, link to your games portfolio, description of your game and link to the messenger where we can contact you.

We will use this information solely to assess your game and the possibilities of your future cooperation with us as a publisher, and to contact you back.

Account information

To use all functions of the Service, you will have to create a user account. We will collect your name and email address for setting up your account. Also, you may add additional account information such as a profile photo to customize your account.

Service usage statistic data

During your use of the Service, we collect your IP logs. The data categories we receive may include the model of the device, operating system version, country of geolocation, user ID, date, time, and duration of the user session, pages viewed, links clicked. We use this data for Service security, debugging, and Service improvement purposes.

Additionally, the information we collect via the Service depends on the content and materials you use, includes:

Derivative Data

Information our servers automatically collect when you access the Service, such as your native actions that are integral to the Service, including liking, re-blogging, or replying to a post, as well as other interactions with the Service and other users via server log files.

Financial Data

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Service.

Third-Party Data

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Service permission to access this information.

In advance, if you choose to share data about yourself via your profile, online chat, or other interactive areas of the Service, please be advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the Service.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we use information collected about you via the Service to:

1. Provide you with our promotional services.
2. Compile anonymous statistical data and analysis for use internally or with third parties.
3. Create and manage your account.
4. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Service to you.
5. Email you regarding your account or order, as well as provide technical support to you.
6. Enable user-to-user communications.
7. Fulfill and manage purchases, orders, payments, and other transactions related to the Service.
8. Generate a personal profile about you to make future visits to the Service more personalized.
9. Increase the efficiency and operation of the Service.
10. Process payments and refunds.
11. Assist law enforcement and respond to subpoena.

12. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
13. Resolve disputes and troubleshoot problems.

LEGAL BASIS FOR PROCESSING

Performance of a contract

We process your account information and information required for game testing (game name, gameplay vide link (Youtube, Dropbox, Google Drive, etc), game description, and others) to provide you with our services based on our contractual obligations through the Service (testing games and providing developers with market insights and best practices). If you do not provide us with this data, then we will not be able to provide you with our services.

Consent

We may process your account information to send you notifications with the information about our updates, new services, offers, and products, but only if you allowed us entirely voluntarily to do so (i.e., based on your consent).

For the personalization, analytics, and marketing cookies on our Service, we will obtain consent from you first, which serves as a legal base for the processing of your information

You can withdraw your consent at any time by contacting us directly. The withdrawal will not affect the lawfulness of processing based on consent before.

Legitimate interest

We process your contact information obtained through the HC game test request form in our legitimate interests to choose the most appropriate game for future cooperation and publishing.

Additionally, for improving the quality of the Service and analyzing Service traffic, as well as debugging its work, we process your IP logs and traffic data. in our legitimate interests.

Legal obligation

We may process your account information to comply with the legal regulations of the country of our establishment, such as payment of taxes and compliance with financial regulations.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights

If we believe the release of information about you is required by law or in connection with any legal proceedings, is necessary to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance. Such service providers enter into contractual agreements with us by which they observe confidentiality and data protection according to the data protection law and GDPR.

The involvement of such providers/contractors may imply the transfer of personal data outside of the European Economic Area. To ensure compliance with data protection requirements on international transfers, suitable safeguards will be taken with these providers. If you would like to learn more, feel free to contact us by the means provided at the end of this document.

Please note that the third-party providers/contractors can only process your data on our behalf and do not use it for their own purposes.

Interactions with Other Users

If you interact with other users of the Service, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

Social Media Contacts

If you connect to the Service through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party.

Except as provided in this privacy notice, we will not sell, share or rent your information to third parties.

TRACKING TECHNOLOGIES

We may use cookies, tracking pixels, and other tracking technologies on the Service to help customize the Service and improve your experience.

Cookies

We use cookies to appropriately run the Service, personalize its content for you, analyze the traffic, and provide you with personalized advertisements. To learn more about the cookies, please read our [Cookie Notice](#).

Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the Service, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize

your online experience with us. For more information about opting-out of interest-based ads, visit the [Network Advertising Initiative Opt-Out Tool](#) or [Digital Advertising Alliance Opt-Out Tool](#).

Analytics

We may also partner with selected third-party vendors, such as Unity Analytics, Amplitude, and others, to allow tracking technologies and remarketing services on the Service through the use of first-party and third-party cookies, to, among other things, analyze and track users' use of the Service, determine the popularity of certain content, and better understand online activity. By accessing the Service, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

If we learn of a security system's breach, we may attempt to notify You electronically by posting a notice or sending an e-mail to You.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will process your personal data as long as you use the Service. We undertake the obligation to erase or anonymize your personal data in case you would not use the Service for a long time (more than 2 years). Still, we may retain your personal data for a longer time as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

YOUR RIGHTS

To maintain control of your personal data, you may exercise certain rights regarding your information. In particular, you have the right to:

- Object to the processing of your information. If we process your information in our legitimate interests, e.g., for our marketing purposes, you can object against it. We will consider your request and, if there are no compelling interests to refuse it, stop the processing for such purposes;
- Access your information. You have the right to know if we process your information; obtain disclosure regarding certain aspects of the processing; and obtain a copy of the information undergoing processing;
- Verify your information and seek its rectification. If you find that we process inaccurate or out-of-date information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;
- Restrict the processing of your information. When you contest the accuracy of your information, believe we process it unlawfully or want to object against the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent. In this case, we will

not process the information for any purpose other than storing it until the circumstances of restriction cease to exist;

- Ask us to delete/destroy/otherwise remove your information. If we are not obliged to keep the data for legal compliance, we will remove your information upon your request;
- Ask us to transfer your information to another organization if we process the information based on your consent or on the necessity to perform the contract; and
- Withdraw consent. You have the right to withdraw the consent that you have given with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

Please note that we may ask you to verify your identity before responding to such requests.

You can complete the request to exercise your right by contacting us at elina.games.studio@gmail.com

If you believe that our use of personal information violates your rights, you can lodge a complaint with the competent data protection authority.

POLICY FOR CHILDREN

Our Service is not intended for use by children under the age of 16 ("Children"). We do not knowingly collect Personal Data from or market to children under the age of 16. If you become aware of any

Personal Data we have collected from children under age 16, please contact us by email: elina.games.studio@gmail.com.

If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at:

ul. Zur Uram, 32, Kazan, Russia

email: elina.games.studio@gmail.com