

FUNFINITY GAMES PRIVACY POLICY

Update March 2024

1. INTRODUCTION

We are committed to protecting your privacy. This privacy policy tells you how we collect, store, process and use your personal information when you use this website.

Our legal status is that of a “data controller” and in this capacity we will securely store and process your personal information which you have provided to us or which we otherwise collect. Data controller is a legal term used in US, UK and EU legislation to signify the person who controls what to do with any given personal information.

2. THIRD PARTY LINKS

Our products may include links to third-party products, plug-ins and applications. Please note that this privacy policy applies only to the personal information that we collect through our products (or via competitions on our applications on third party products including social networks), or receive from third parties and we cannot be responsible for personal information that third parties may collect, store and use through their own products and services. You should always read carefully the privacy policy of each such third party website and service you visit or use.

In addition, when you provide to us information on a third party site or platform, (for example via our competitions on our applications on social networking sites), the information may also be collected by the third party website and may be subject to their privacy policy.

3. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data includes any information about an individual from which that person can be identified. This does not include any information that does not, and cannot be used to, identify an individual.

We may collect personal information from you when you:

- create an online account;
- contact or request information from us in any other way;
- respond to communications from us;
- participate in surveys or other market research; or
- communicate with us via social networking products, third party apps or similar technologies.

Please note, as you interact with our products, we will automatically collect data about equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Finally, we collect personal data from analytics providers such as Google..

We will indicate where any personal information we have requested is mandatory or optional. Please note that if you decide not to provide certain information which we have indicated is mandatory, in some circumstances this may mean we are unable to provide you with a certain service or product.

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this notice.

We do not collect any special categories of personal data nor do we collect any information about criminal convictions and offenses.

4. HOW WE USE YOUR PERSONAL DATA

We will only use personal data when the law allows us to and we do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Most commonly, your use of our products may lead us to using your personal data in the following circumstances:

To provide our activities or online content and to provide information about our activities and online content which may be tailored to your individual tastes;

- for system administration purposes and for internal operations (including troubleshooting, data analysis, and testing) to ensure the Services operate properly;
- to analyze your use of our products to improve the user experience and to ensure that content is presented in the most effective manner for you and for your device;
- to provide customer support and ensure we provide a good level of customer service;
- where you have given us your consent or we are otherwise permitted by law, to contact you (including by e-mail) with products and services which we think may interest you – you can unsubscribe from our marketing communications at any time;
- where you have given your consent, to pass your personal information to selected third parties for marketing purposes; and
- for geo-based redirection (so that if you see the correct version of our products depending on the country from which you are accessing the products);
- for security and fraud prevention;
- to ensure that our products are safe and secure; and
- to comply with applicable laws and regulations.

5. CHILDREN

Our products are designed partly for young adults. Therefore we are aware that we must be extra cautious when processing personal information. In most cases, we do not anticipate that we will be collecting personal information directly from any children. We anticipate and assume that we will be collecting personal information only from parents or guardians.

If you are under the age of 13, you may only provide personal information if you have the consent of, and are supervised by, a parent or guardian.

If we believe a child has entered into any competitions from us and the child is under 13 we will not process any personal information of that child without the consent of the parent or guardian. If the user is 13 or over we will only collect and process personal information as long as we believe the user understands what is involved.

6. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use the personal information. In almost every case the legal basis will be one of the following:

Consent: For example, where you have provided your consent to receive certain marketing from us. You can withdraw your consent at any time, including by clicking on the “unsubscribe” link at the bottom of any marketing email we send you.

Our legitimate business interests: Where it is necessary for us to understand our customers, promote our services and operate effectively as a provider of content and related services, provided in each case that this is done in a legitimate way which does not unduly affect your privacy and other rights.

Compliance with law: where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

7. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it as detailed in this policy, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. MARKETING AND EXERCISING YOUR RIGHT TO OPT-OUT OF MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us, signed up to receive a publication, entered a competition and you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time at support@funfinity.info.

Where you opt out of receiving these marketing messages, this will not apply to personal data collected in other ways as detailed in this policy.

9. DO WE SHARE PERSONAL INFORMATION WITH ANY THIRD PARTIES?

Where applicable, we may share your personal information with our marketing /data processor, who hosts any of our products and stores all associated data on our behalf, and sends out certain e-mails on our behalf.

If a third party acquires all (or substantially all) of our business and/or assets, we may disclose your personal information to that third party in connection with the acquisition. We may also disclose your personal information where we are required to do so by applicable law, by a governmental body or by a law enforcement agency. We may also disclose personal information to protect the rights, property or safety of us or our users, or others, and in order to enforce or apply our terms and conditions (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction) or where we are required to do so by applicable law, by a governmental body or by a law enforcement agency.

Other than as described in this privacy policy we will not disclose, sell or rent your personal information to any third party unless you have consented to this. If you do consent but later change your mind, you may contact us and we will cease any such activity.

10. COOKIES

Cookies are small bits of text that are downloaded to your computer or mobile device when you visit a website. Your browser sends these cookies back to the website every time you visit the site again, so it can recognise you and can then tailor what you see on the screen.

Below is a list of the cookies we use and the purpose of use.

Session Cookies	These enable you to carry out some essential functions on our sites, such as maintaining log in details for the session or a transaction. They also help by minimizing the need to transfer information across the internet. They are not stored on your computer and they expire when you terminate your browser session or logout of certain areas.
Analytics	We like to keep track of what pages and links are popular and which ones don't get used so much to help us keep our sites relevant and up to date. It's also very useful to be able to identify trends of how people navigate (find their way through) our sites and help us provide a more friendly solution.
Third -party cookie	Google Analytics tracking (and most web tracking software) uses cookies in order to provide meaningful reports about site visitors. However, Google Analytics cookies do not collect personal data about website visitors.

Cookies are used on our site to ensure that we give you the best experience on our products. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on our website.

Some cookies are essential so you can move around our products and use the features. These cookies don't gather information about you that could be used for marketing or remembering where you've been on the internet. You can delete cookies via your browser should you wish to, but this will restrict the functions that you are able to carry out on our products.

You'll find more information about cookies at www.allaboutcookies.org, which gives details on how to delete cookies from your computer. For information on how to do this on your mobile phone browser, please see your handset manual.

11. DATA SECURITY

We take appropriate technical and organizational measures to safeguard the personal information that we hold about you and regularly review our security measures to consider new technologies and methods, to safeguard your data. Please note that no transmission over the internet can ever be guaranteed secure and we consequently cannot guarantee the security of any personal information that we receive over the Internet.

12. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out legal work, for the establishment or defense of legal claims.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

13. YOUR LEGAL RIGHTS

You have the following rights under data protection laws in relation to your personal data. Where you exercise these rights, we will provide information to you as to what action has been taken, if any, within 30 calendar days of receipt of your request. Where no action has been taken, we will explain our reasons why.

Taking into account the complexity and number of requests, it may take us up to 90 calendar days to respond to your request. Where we intend to extend the deadline for responding, you will be informed within 30 calendar days of receipt of your request.

- right to be informed about how personal data is used;
- right to access personal data;
- right to have inaccurate personal data rectified;
- right to have personal data erased in certain circumstances. Please note this is not a blanket right to require all personal data to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your personal data;
- right to restrict processing of personal data in certain circumstances;
- right to data portability – in certain circumstances you can request to receive a copy of your personal data in a commonly used electronic format. This only applies to personal data that you have provided to us. Information about you which has been gathered by monitoring your behavior will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the personal

data must be processed for the performance of a contract and the processing is carried out by automated means (i.e. electronically);

- right to object to processing of personal data in certain circumstances, including where personal data is used for marketing purposes; and
- right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect – you have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

14. PRIVACY POLICY CHANGES

We may from time to time revise this privacy policy so please check back regularly to keep informed of updates. We will provide notice to you if these changes are material and will seek your consent if the change could have a detrimental effect on you.

If you have any questions regarding this Privacy Policy or would like to exercise any of the above rights, please contact us by e-mail: support@funfinity.info

Please note, the email address above is for privacy related queries only. For other queries please use support@funfinity.info.

Alternatively, you can contact us in writing at our registered address above.