

PRIVACY POLICY

PREAMBLE. GENERAL PROVISIONS

Thank you for playing the game and game services developed and published by HVAC Games (HVAC Holding Limited) (the “Tower Shooter: Crazy Bunker”)!

This Privacy Policy explains who we are, how we process (i.e. collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destruct) personal information about you, and how you can exercise your privacy rights. We are HVAC Holding Limited a company under laws of Hong Kong («HVAC», «we», “us”, “our”), a developer and publisher of games and mobile game applications that are made available via app stores including the Apple App Store and Google Play Store. This Privacy Policy applies to personal information that we collect through our website, games, mobile applications and other products (together “Services”). By using our Services, you agree to be bound by this Privacy Policy and consent to our processing of information as specified therein.

1. HOW TO CONTACT US

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us in writing.

Our contact information is below:

Postal Address: Rooms 2110, 21/F., Wing on Centre, 111 Connaught Road Central, Hong Kong

Email: hvacholdingltd@gmail.com

2. WHAT DATA WE PROCESS

2.1. The data below may be provided by different sources, including you (whether intentionally or automatically through the use of our services), and our partners (as described in Section 5 below), or may be generated by us on the basis of the aforementioned data.

2.2. Under the terms and conditions of this Privacy Policy we process the following types of data about you which are accompanied with examples of such data (sample data for reference) and primary sources of such data (source):

- | Type of data | Sample data for reference | Source |
|----------------------|--|---|
| 1. Personality data | Nickname, age (mostly age range), gender and other data about your person we may be provided by you (at your own discretion) or our partners provided they have a valid lawful basis for that (e.g. your consent) | You (intentionally), partners |
| 2. Identity data | Real name, date of birth, age, gender, ID, Tax/VAT number, scan of ID, passport or another identifying document, tax certificate or any document issued by state authorities, photo or video recording with you, clothing size and other data about your identity as an individual which may be necessary for a particular purpose designated herein | You (intentionally) |
| 3. Contact data | Contact e-mail, recovery e-mail, mobile phone number, residential address, shipping address, social network ID, parent or legal guardian/representative contact details | You (intentionally) |
| 4. Localization data | IP address and related geolocation data (city and country), language preferences | You (both intentionally or automatically), partners |

5. Account data Your User ID (which is generated by us), login name, password (for verifying you while signing-in), nickname, avatar (profile photo), e-mail, registration date and time, our games you play, list of your purchases, gifts, balance, any other data you may leave within your HVAC Account You (both intentionally or automatically), partners
6. User generated content (UGC) data Any data submitted in forums, messages, chats, etc. by the user of their own choice, other than Submissions data. Depending on the services and place of posting (chat room or forum), this information can be available to some or all other users of our services You (both intentionally or automatically)
7. Data regarding your requests or other submissions to us (“Submissions data”) Your feedback, comments, answers to questionnaires, opinions and other submissions with regard to our services form of texts, screenshots, audio or video recordings You (intentionally)
8. Data about your behavioral actions when using our services (“Behavioral data”) Information about the way you use our services, its frequency and etc. (e.g. log-ins, services segments used, page views, transactions made within our services) other than Browsing data and Gameplay data You (automatically), partners, or generated by us
9. Data about your browsing behavior and your identity on the Internet (“Browsing data”) Cookie files (more details are available in our Cookies Policy), Your IP address, name of your browser, name of your Internet provider, traffic source (including the source from which our games or apps were installed on your device) You (automatically), our affiliates and partners, or generated by us
10. Gameplay data Any data about your in-game actions in tangible (including electronic) form, data about your in-game interactions with other players, duration of your gaming sessions, data about choices made within gameplay You (automatically), generated by us
11. Game data Game version, installation date and time, graphics, audio and other game settings, game achievements, progress and inventory, other in-game results, last launch date and time and etc. You (automatically)
12. Data about your device(s) (“Device data”) Device ID, MAC address, location data (city and country), language settings, time zone and localization settings, device manufacturer and model, operating system, installed applications, phone network operator, network type and connection, Internet connection speed, screen resolution and orientation, device hardware characteristics (CPU, GPU, RAM and ROM size, battery etc.) and other software and hardware information about your device You (automatically), partners
13. Customer service data Case details, case history, complaint history, customer service chat logs, penalties history, any submitted files and information You (intentionally)
14. Purchase data Name and cost of purchased in-game items, total cost of purchased in-game items, total amount of spent, amount in-game currency you possess or spent You (automatically), partners
15. Third-party services data (e.g. Google Account, Steam, PSN, Apple Game Center) Nickname (on third party platform), User ID, including social network IDs and application store IDs, e-mail, any types of identifier for advertisers (IDFA, such as Apple IDFA and Google AAID) and other data necessary for your registering in our services via your social or application store

accounts and/or connecting your social account to our services/HVAC Account (e.g. Facebook, Twitter) You (automatically), partners

16. Analytical data Any information derived from the data mentioned in this table (except identity data) used for analytics, including retrieving in-game, marketing, advertising or other statistics Generated by us

2.3. In case we need to process another data about you, we will request a separate approval for such data processing from you.

2.4. Please note that we DO NOT INTENTIONALLY process any special categories of personal data (including any information about your health, race, religion, political views, etc.). We kindly recommend you remain cautious when sharing this data about yourself when using our services, in game chats, on the websites (forums, commentaries, etc.) and otherwise on the Internet.

3. FOR WHAT PURPOSE WE PROCESS YOUR DATA

3.1. We process your data as we aim at providing you our services in the best possible manner and the highest level of service, efficiency and your convenience, and, in some cases, to make the mere provision of such services possible, including from the technical prospective. The data processed by HVAC according to this Privacy Policy can only be used for the following purposes (processing purpose) which are accompanied with the examples of particular situations when your data is being used (purpose examples), the data used for such purposes (data processed) and lawful basis for processing such data for respective purpose (lawful basis for processing):

Processing purpose	Purpose examples	Data processed	Lawful basis for processing
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1.	Providing the basic services under the Terms and Conditions supporting our services		Operating and
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Creating user profiles, maintain the users database

Enabling you to communicate with other players in chats and on forums	Personality data
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Localization data

Account data

UGC data

Behavioral data

Browsing data

Device data

Game data

Gameplay data

Purchase data

Analytical data

Third-party services data	Contract performance
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Consent (additionally)

2.	Personalizing our services for you	Storing your preferences and settings
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Personality data

Localization data

Account data

UGC data

Submissions data

Behavioral data

Browsing data

Device data

Game data

Gameplay data

Customer service data

Purchase data

Analytical data

Third-party services data Consent

3. Verifying your identity and your will Verifying your logging-in

Verifying your will to make a purchase within our service

Verifying your will to commit other actions within our service Identity data

Contact data

Third-party services data Contract performance

Legitimate interest

Consent (additionally)

4. Enhancing our services and your user experience Enhancing our games and other services, creating and developing new ones

Linking your HVAC Account to your third-party accounts (including Android, Apple Game Center)

Bugs fixing and other troubleshooting

Conducting services-related business optimizations Any data excepting:

- Identity data
- Contact data Consent

5. Organizing the work of customer support service Receiving and responding your inquiries and requests

Fulfilling your inquiries and requests with regard to our services

Providing you with other support services in connection with our services

Maintaining proper functioning of our customer support service Any data required for response to user's request Contract performance

Consent (additionally)

6. Creating and utilizing analytics on our services and audience Analyzing your activity while using our services (e.g. web-sites)

Improving our services according to the analytics collected

Utilizing the analytics collected for commercial promotion of our services and other advertisement/marketing purposes Any data excepting:

- Identity data
- Contact data Consent

7. Conducting advertising and marketing activity Communicating users about discounts and promotions with respect to the services

Serving advertisement relevant to you

Conducting quizzes, contests, competitions, awards and other promo events

Sending newsletters (including about patches and updates, news, forthcoming releases, special promotions and competitions, and other events directly related to our services) and marketing materials to you relating to our services

Informing you about our offers (discounts, in-game offers and other relating to our services) which may be interesting specially for you

Conducting our own advertising campaign of HVAC products or services, using the data for other internal marketing purposes (or other marketing purposes related to the services)

Personality data

Localization data

Account data

Behavioral data

Browsing data

Device data

Gameplay data

Purchase data

Analytical data

Third-party services data Consent

8. Securing your user experience Fighting frauds (such as cheating, tampering, unauthorized transactions and other unfair methods of play), including by means of players behavior analyses, banning players and taking any necessary precautions measures

Personality data

Account data

UGC data

Submissions data

Behavioral data

Device data

Game data

Gameplay data

Customer service data

Third-party services data Consent

Legitimate interest (additionally)

9. Conduct surveys and research Organizing questionnaires with regard to our services

Receiving feedbacks from you Personality data

Localization data

Account data

Behavioral data

Browsing data

Device data

Game data

Gameplay data

Purchase data

Analytical data

Third-party services data Consent

10. Enabling purchase opportunities within our services Verifying and confirming your payments

Sending you respective invoices

Transferring funds (e.g. purchased in-game items) to your HVAC Account Personality data

Identity data

Contact data

Account data

Purchase data

Third-party services data Contract performance

Consent (additionally)

11. Providing security of our services and integrity of our business Preventing (and fighting) violations of the Terms and Conditions

Preventing infringement of our intellectual property and other rights Any data

Legitimate interest

12. Compliance with our legal obligations imposed by applicable laws Compliance with any applicable privacy laws and regulations (GDPR, COPPA and etc.), tax or accounting rules, know-your-customer, anti-laundering and other laws HVAC have an obligation to comply with

Any data Legal obligation

13. Contacting you on other matters Contacting you with regard our services on the matters described in this table earlier Any data Contract performance

Legitimate interest

Consent (additionally)

For your convenience we explained the meaning of each lawful basis used in the table above:

- Consent - your data is processed after receiving from you a freely given, specific, informed and unambiguous consent for that. To ensure security of your privacy laws rights, we may additionally request your consent for processing your data on other lawful basis (e.g. contract performance or legitimate interest), however, we also draw your attention that the withdrawal of such consent does not preclude us to process your data if such processing is permitted by applicable law on the other basis (including those mentioned right below).
- Contract performance - your data is processed when necessary to perform a contract with you, such as the Terms and Conditions, or to take necessary steps for contracting you if you request that.
- Legal obligation - your data is processed when (and in the manner) required by applicable laws.
- Legitimate Interest - your data is processed in order to comply with our legitimate interests (such as preventing violations of our intellectual property and other rights), or legitimate interest of other party (including you), when these interests outweigh your own rights and interests.

3.2. In case we need to process your data for another purposes, we will request a separate approval for such purposes from you.

3.3. We specifically draw your attention that HVAC may also use your data for creating anonymized databases (including any compilations, lookalike models and etc.) which will be further utilized by us (or any third party upon our authorization) for any purpose, including our internal ones. We guarantee such databases will not contain any data which could be used for identifying you (personal identifiable information), despite the fact such data will be derived from your personal data and the data of other users. Likewise, we can also use your data in anonymized form, e.g. by the compilation other than described above, in the way it does not constitute your personal data after anonymizing/compiling. Before anonymizing, your data is used strictly as set forth in this Privacy Policy.

4. HOW LONG WE STORE YOUR DATA

4.1. We retain any of your personal data which we collect for as long as your HVAC Account is active according to the Terms and Conditions, and/or for as long as it is necessary to provide you with the services, and while we have a valid lawful basis for processing your data. We also erase your personal data after reaching the purposes for which we collected such data.

4.2. Please consider that we have the right to continue to retain some of your user data even after complying with your request to delete such data in the following cases:

- We have the lawful basis to further process your data other than a consent from you. As instance, we may be required to do so in order to comply with applicable laws (as instance, for tax or accounting reasons, know-your-customer, anti-laundering or other legal requirements and obligations);
- Your user data has been anonymized in the way it cannot be used for identifying you, and therefore is no longer your personal identifiable data.

5. WITH WHOM & HOW WE SHARE YOUR DATA

5.1. We cannot provide all services necessary for the successful operation of the Games by ourselves. We must, therefore, share collected information with third parties for the purposes of developing and delivering our services, displaying advertisements, conducting analysis and research and for measuring our and our Partners' advertising campaign performance. We also reserve the right to disclose your information (including personally identifiable information) when we are legally required to do so, to disclose your information in an anonymous and aggregated manner, meaning you could not be personally identified from it.

So we may have to disclose personal data with the parties set out below for the purposes set out in the tables above.

In order to make you know about your data flow and possible transfers, we prepared the following table where we have described which categories of recipient we usually transfer your data to (category of recipient), which our main partners, as an example, comprise such categories or which our counterparts may be qualified for such categories (partner examples or explanation), for which purpose, as defined in Section 3, we share your data with such third parties (share purpose) and which lawful basis, as defined in Section 3, we invoke for the transfer (lawful basis for transfer):

Category of recipient	Partner examples or explanation	Share purpose
Lawful basis for transfer		
1. Analytics partners	Unity Technologies (Unity Analytics) Google LLC (Google Play Market)	

Apple Inc. (Apple iTunes Connect) Creating and utilizing analytics on our services and audience

Conducting advertising and marketing activity

Conduct surveys and research

Personalizing our services for you

Enhancing our services and your user experience

Traffic analysis Consent

2. Tracking, analytics and statistics partners Unity Technologies (Unity Analytics)

Analysis of data, such as impressions, clicks, installs, events in the application.

Partners can use the API and SDK in our application, which will allow them to collect the data and information specified above. Consent

3. Advertising partners Apple Inc. (Apple Search Ads)

Unity Technologies

(Unity Ads)

Conducting advertising and marketing activity

Personalizing our services for you.

Displaying ads in the app.

We allow our partners to track impressions, clicks, installs and other metrics. Consent

4. Operating partners Apple Inc. (iCloud)

Google LLC (Google Cloud Platform) Providing the basic services under the Terms and Conditions (as instance, among others, for hosting our servers or Cloud service providers)

Consent

5. Payment partners Sberbank Online, Visa, MasterCard,

PayPal, QIWI Wallet, Yandex Money, Enabling purchase opportunities within our services

Contract performance

Consent (additionally)

6. Assignees Any assignee of our rights and obligations under the Terms and

Conditions Any purpose Legitimate interest

Consent (additionally)

7. Government, regulatory, judicial, enforcement or other state authorities Data protection authority, governmental trade commission, police, court, bailiffs and etc.

Compliance with our legal obligations imposed by applicable laws Legal obligation

8. Software Unity Technologies

(Unity platform) Collecting information about the device Consent

5.2. As a rule, we do not share your data with anyone other than specified in the table above, and we ensure the confidentiality of your data. However, in some cases we may be obliged to provide other third parties with your data if such obligation is imposed on us by applicable law.

Processing your data by our partners

5.3. Usually our partners determine the principles and purposes of user data processing by themselves. It means that the processing of your data by them is not covered by this Privacy Policy and is done in accordance with rules imposed by such partners.

5.4. For your convenience we prepared the list of our main partners to whom we usually disclose user data and the list of their respective privacy policies. Please note that this list is not

exhaustive and does not cover all our partners (only main ones), and some of the policies below may be not applicable to your region, please make sure that the privacy policy you read applies to your country of residence):

Partner Privacy Policy available at

Google LLC

(Google Play market) <https://policies.google.com/privacy?hl=en&gl=by>

Apple Inc. (Apple iTunes Connect) <https://www.apple.com/legal/privacy/en-ww/>

Apple Inc. (iCloud) <https://www.apple.com/privacy/>

Google LLC (Google Cloud Platform) <https://cloud.google.com/privacy>

Unity Technologies (Unity Ads) <https://unity3d.com/legal/privacy-policy>

Unity Technologies (Unity platform) <https://unity3d.com/legal/privacy-policy>

Unity Technologies (Unity Analytics) <https://unity3d.com/legal/privacy-policy>

5.5. Despite we indicate the payment data as to be processed by us, for your better understanding the data amount we process about you, we DO NOT anyhow save or store your payment data at any period of time. Such data is de facto collected and further processed by our payment partners; we only provide them with the technical opportunities to do so through within our services. As such partners commonly do not have any general privacy policy unified for all regions, we recommend you to access and read out the relevant documents while making a payment via their platforms (e.g. after you have been redirected by our services to the website of a relevant platform when initiated the payment procedure).

5.6. We may share your user data with any competent law enforcement body, or regulatory or government agency, or with the courts for the purposes of compliance with applicable legislation, or in response to an official and legal request.

5.7. In the future, we may enter into contracts with other partners. If this is the case then we will make every reasonable effort to update the list of our partners (as well as the links to partners' privacy policies in clause 5.4) which is provided in this Privacy Policy in a timely manner, but in any way no later than once every six months, or more often in the event of a significant change in our data processing practices.

Transferring your data abroad

5.8. We operate all over the world, and therefore we may transfer your data to our counterparties (partners, affiliates and etc.) in different countries, including those which are located outside the European Economic Area (EEA). We do all our efforts, including those imposed on us by applicable law, to ensure an adequate level of personal data protection in each case, HOWEVER, we would like you to consider that the countries to which we transfer your data may not have the same data protection laws as your jurisdiction.

5.9. We take all reasonable steps to ensure the confidentiality of your personal data when it is transferred abroad, including to the countries which are located outside the European Economic Area. We will also take reasonable steps to assure that third parties to whom we transfer any personal information will provide sufficient protection of your data. In particular, HVAC undertakes reasonable physical, technical and administrative security measures to ensure your data is adequately protected, including when it is transferred to countries which are located outside the European Union or European Economic Area: such measures include (without limitation) executing standard contractual clauses which have been adopted by the European Commission, when transferring your data to the third parties located outside the European Economic Area.

Your data and other users

5.10. Please note that other users of our services may see some of your data we process. For example, other users are able to see your nickname and avatar (profile photo) and the data of your linked accounts (including Apple Game Center accounts, Google Play Games Services). They can also see any content you post publicly within our services (public messages on forums, attached files and etc.), or some of your game results (data of in-game ratings or leaderboards) and achievements.

6. YOUR RIGHTS

You have certain rights in connection with your personal information and how we handle it. Some of these rights may be subject to some exceptions or limitations. You can exercise these rights at any time by following the instructions below or sending us relevant requests to

Your rights include:

- Right to withdraw your consent (e.g. you may withdraw your consent to show personalized ads to you, by loading Terms & Privacy from your Game settings and following instructions in section Personalized Ads Consent Withdrawal in Privacy Policy)
- Right to access your data (e.g. you may check what data we store about you, for this purpose please load Terms & Privacy from your Game settings and follow instructions in section Request a Summary of Personal Data in Privacy Policy)
- Right to correct your data (e.g. you can contact us if your email address has been changed and we should replace your old email address)
- Right to have your data deleted (e.g. you can contact us if you want us to delete certain data that we have stored about you, please load Terms & Privacy from your Game settings and follow instructions in section request Personal Data to be removed in Privacy Policy)
- Right to restrict processing of your personal information (e.g. you can contact us if you want to restrict processing). You have the right, under certain circumstances, to restrict the processing of your Data. In this case, we will not process your Data for any purpose other than storing it.
- Right to take your data with you (e.g. you can contact us to receive your data if you want to upload it to another service)
- Right to object how your data is handled (e.g. you can contact us if you do not agree with any user analytics procedures as described within this privacy policy). You have the right to object to the processing of your Data if the processing is carried out on a legal basis other than consent. Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the HVAC or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the

objection. You must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether we are processing Personal Data for direct marketing purposes, you may refer to the relevant sections of this document or contact us at « *Вставить email адрес для запросов»

- Right to send complaints to the supervisory authority (e.g. you can contact the data protection supervisory authority directly).
- Other rights. You may have other rights in accordance with this Privacy Policy and applicable laws

7. CHILDREN'S PRIVACY

We do not knowingly collect or sell personal information from children under the age of 18 (or any age otherwise defined under applicable law) without parental consent or unless permitted by applicable law. If you are a parent and you become aware that your child has provided information to us, please contact us using one of the methods specified below and we will work with you to resolve this issue. For contact with us, please refer to "1. HOW TO CONTACT US". If we become aware that we have collected Personal Information from a child under age 18 without verification of parental consent, we will take steps to remove that information from our servers.

Under our Terms of Service users of our games must be at least 18 years of age. Although the graphical content of the games may be suitable for younger audiences, there are multiple reasons for responsible developers to apply a minimum age of 18. Some of these reasons are in-app purchases and privacy.

Please note: When you download our games from e.g. Google Play or Apple App Store you will find published age recommendations in the Apps description. However, these age or maturity classifications refer only to the content suitability (similar to movie ratings G, PG or PG-13 in the U.S., but related to gameplay, animations, etc.) according to the respective rating body responsible for such ratings. As these ratings are done independently by a third party without our contribution, they are not necessarily in line with our Terms of Service.

For more info on how these categories are defined, visit these support websites for Apple and Google.

8. ADVERTISING

8.1. In General

We use advertising to fund our Services and to make our games available for free. We offer our Games for free or at low cost and in order to do that we need to share information we collect from you with our third-party advertising partners. As a safeguard to protect your privacy, we only store personal information temporarily. The information collected helps us to improve our website and Games and – at the same time – keep our Games free for a wide player base.

As a European-based company, when you use our Games, we rely on our legitimate interest to show advertisements to you. The legal basis to show ads is the legitimate interest in accordance with the European data protection requirements under Art. 6 para. 1 lit. f GDPR, which we evaluated together with our data protection officer.

Before sharing any information with our advertising partners for the purposes of personalized advertising, we always ask for your consent, given when you press accept at relevant button at

loading of the Game. The purpose is to improve our Games and provide the player with more relevant ads. We allow our advertising partners to show personalized ads to you only if you have pressed ACCEPT in relevant pop-up window and so consented to the sharing of your personal information for the purposes of personalized advertising. Our advertising partners use different technologies for the purposes of personalized advertising that process your personal information in different ways, so please review their data processing practices before you ACCEPT to show you personalized ads at loading of the Game. The list of our current advertising partners with links to their privacy policies is available [here](#).

The legal basis to show personalized ads is consent in accordance with the European data protection requirements under Art. 6 para. 1 lit. a GDPR. In addition, data processing agreements were concluded with external ad technology providers networks in accordance with the requirements of Art. 28 GDPR. We also ensure that our external service providers are committed to a high level of data protection by concluding data protection agreements.

You have an option to withdraw your consent to sharing your personal information for the purposes of personalized advertising at all times. You can withdraw your consent by going to the Game settings and clicking the terms & Privacy button therein, in section 'Personalized Ads Consent Withdrawal' of the Privacy Policy you will be able to manage your preferences by choosing to which advertising you would like to get. When you decide to withdraw your consent or if you do not provide your consent, you may still see the same number of ads on your mobile device; however, these ads may be less relevant because they won't be based on topics you like, your interest, behavior, demographics, etc. Our advertising partners may continue to show you ads based on the content of the application you are using.

8.2. In-game advertising (i.e. when you view ads in Our Games)

To enable us to show in-game ads, we may send your advertising ID and IP-address to advertisers (or ad networks) to enable them to find appropriate ads to serve to you in our games and on third-party properties. You can control and limit our use of your advertising ID in your device settings. We do not control which specific ads are shown in our games (it is controlled by ad networks), but we do blacklist certain categories of ads.

Advertising IDs are used by the ad networks for a number of purposes (please refer to the Privacy Notices of our advertising partners listed [here](#)) including:

- limit the number of times you see the same ad;

- ensure they are dealing with humans with real devices and not 'automated' bots;

- serve you with advertisements likely to be relevant to you based on your advertising ID engagement with other brands and ads, also recorded using your advertising ID and using your general geographic area. Other brands buy advertisement placement via an ad network or ad exchange to advertise their products in Our Games. The ad network or ad exchange acts as intermediary between the other game companies and Us. In order for an ad network to charge the company buying the ad, clicks from the ad and potentially installs of other developers' applications party apps are tracked. Views, clicks, and installs from ads are measured using Advertiser ID;

- keep track what games you have used to market you similar kind of games. IP-address is typically used by advertisers to broadly see the general geographic area you are coming from (for example country, state, and sometimes at city level).

8.3. View of Our ads on third-party services

We also advertise the Games in other apps by asking ad networks to serve them to audiences that will be interested in them (determined using Advertising IDs).

The Advertising IDs are used by the ad networks for a number of purposes (please refer to the Privacy Notices of our advertising partners listed here) including:

measuring ad effectiveness (looking at aggregated views, clicks and installs they generate through their advertising in other publishers' games);

informing players, that have not been playing for a while, about new content in the Game. We give a list of these users in the form of Advertising IDs to an ad network. Ad network then shows these users ads about the new content;

not showing ads on a game which a player is already playing. We can send a list of active players in the form of Advertising IDs to an ad network. Ad network then excludes these players from seeing the ad;

marketing games to a group of potential players.

8.4. Who can show personalized ads to you?

Please see the list of advertising providers that are allowed to show personalized advertising and review their data processing practices, including the technologies they use for the purposes of personalized advertising here.

8.5. How can you turn off personalized ads?

Besides specific instruments available to users via the Game you can use your device settings. iOS

Open the "Settings" application of iOS and select the "Privacy" menu item and then the "Advertising" sub-item. If you activate the "Limit ad tracking" option, we can only take limited measures such as identifying unique users or combating fraud. In the same menu you can always delete the IDFA ("Reset Ad-ID"), then a new ID is created which is not merged with the data collected earlier.

Android

Open the "Settings" application and select the "Google" menu item. Depending on your device, this option may not be visible on the main menu but you may use the search function at the top of the Settings menu to find it. From there, select the "Ads" sub-item and activate the option "Opt out of Ads Personalisation" to prevent the creation of profiles and the display of personalized advertising. You can delete the advertising ID in the same menu at any time ("Reset advertising ID"), then a new ID will be created which will not be merged with the previously collected data.

9. COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small files that are automatically created when you visit a website and stored on your device.

We allow third parties, including analytics providers, advertising networks, and other advertising service providers, to use cookies and similar technologies to collect information about your application and the use of your services on your various devices. These third parties may use this information to display advertisements on our Services and elsewhere online, across various sites and services tailored to your interests, preferences and characteristics. You can, at your option, control the use and disclosure of information for these purposes.

By accessing our website or using our services, you consent to our use of cookies in accordance with this Privacy Policy. You can disable cookies through the web or phone browser settings, but doing so will disable full functionality of our services.

- **Required Cookies:** We use security-based cookies to ensure the security of our services. We may, among other things, use the information obtained from our Security and Service Integrity Cookies to identify possible fraudulent or abuse activities, enforce our Terms of Service and End User License Agreement, and protect the safety of our users. These cookies are mandatory and cannot be blocked if you wish to use the service.

- **Performance and Functional Cookies:** We use analytics and investigation cookies to collect information about how visitors use our services, including the total number of users who use our services and the type of devices they use. We may use this information to create reports of aggregated and anonymized information and to assist in improving our services. We also use feature tracking cookies to collect information about how our services are performed. We may use the information to create reports and improve our services.

- **Advertising Cookies:** We use advertising cookies to personalize the advertisements displayed to you on the Service and on third party websites and services.

Other companies that place advertising on our websites, games and/or applications may use cookies to collect information about you when you view or click on advertisements. We have no control over the activities of such third parties and cannot guarantee that they will comply with the same or similar privacy and security practices as ours. If you have any questions about the use of the information they have collected, you should contact them directly.

10. HOW WE UPDATE THIS PRIVACY POLICY

We will change this privacy notice from time to time and any changes will be contained in a revised privacy notice posted on the website and on StoryToys Apps. This version of the privacy notice was last updated on November ____, 2021. Historic versions of our privacy notice can be obtained by contacting us using the details below.