Last updated: August 4, 2025

Introduction

Welcome! This Privacy Policy explains how Game Tunes collects, uses, stores and protects the personal data of users of our Binky Chat messenger (hereinafter referred to as the Application), intended for internal use by company employees. The application is only accessible using the username and password provided by your organization's administrator. We strive to protect your privacy and comply with all international rules (in the field of privacy).

We may periodically update this Privacy Policy. If significant changes are made, we will notify you via the App or by email, if we have one. We recommend that you review this Policy periodically to keep up to date with our data practices.

If you have any questions or concerns, please contact us at: info@binkyacademy.com

## 1. What data do we collect

We collect the minimum amount of data necessary to operate the Application and ensure its functionality. The categories of data collected are listed below:

1.1. Data provided by the administrator

Credentials: The username and password issued by your organization's administrator to access the Application.

Identification Information: Name, position, department, or other data provided by the administrator to identify the user in the Application.

1.2. Data generated when using the Application

Message Content: Text messages, files, or other content sent or received through the App. Metadata: Information about the time when messages were sent, recipients, and other technical aspects of interaction with the Application.

Technical data: IP address, device type, operating system, login information, and other technical information required for the Application to work.

## 1.3. Data that we do not collect

We do not collect data unrelated to the use of the Application, such as geolocation, address book data, photos, or other personal data not provided by the administrator or created during the use of the Application. The application does not use cookies or similar tracking technologies.

### 2. How we use your data

We use the collected data exclusively for the following purposes:

Ensuring the operation of the Application: User authentication, messaging and support for interaction between employees.

Application Improvement: Analyzing technical data to eliminate errors, improve performance, and improve the user experience.

Security: Ensuring data protection and preventing unauthorized access.

Compliance with legal obligations: Compliance with legal requirements, including requests from government agencies, if required by law.

We do not use your data for advertising or other purposes unrelated to the functionality of the Application.

# 3. How we store and protect your data

We use the following measures to protect your data:

Encryption: All data transmitted through the Application is protected using modern encryption protocols (for example, TLS).

Limited access: Only authorized employees of your organization and our trusted service providers who are required to maintain confidentiality have access to the data.

Data Storage: Data is stored on secure servers in [specify region, e.g. European Union] for the period necessary for the purposes described in this Policy or in accordance with legal requirements.

Data deletion: At the request of your organization's administrator or upon termination of use of the Application, user data is deleted, except in cases where their storage is required by law.

### 4. Transfer of data to third parties

We do not share your personal data with third parties, except in the following cases: Administrators of your organization: The data can be accessed by administrators of your company to manage accounts and ensure the operation of the Application. Service Providers: We may involve trusted service providers (for example, hosting providers) who are required to maintain confidentiality and use data only to perform their functions. Legal obligations: We may disclose data if required by law, for example, in response to a request from government authorities or in the case of a merger, acquisition, or restructuring related to Game Tunes.

# 5. Legal grounds for data processing

We collect and process your personal data only if there are legitimate grounds that comply with applicable international and national data protection laws. These grounds include: Legitimate Interest: We may process data to achieve our legitimate goals, such as ensuring the security of the Application, preventing fraud, or improving its functionality, provided that this does not violate your rights and freedoms.

Fulfilling contractual obligations: Data processing is necessary to provide you with access to the Application and fulfill our obligations to your organization.

Legal obligations: We may process data to comply with the requirements of applicable law, for example, in response to legitimate requests from government authorities.

Approval: In cases where your explicit consent to data processing is required, you can provide it or revoke it at any time by contacting us at info@binkyacademy.com.

If you object to the processing of your data based on our legitimate interest, you can send us a request with specific reasons related to your situation. We will review your request and terminate the processing if we are unable to justify its necessity in accordance with applicable law.

If you have any questions about the legal grounds on which we process your data, please contact us at info@binkyacademy.com .

### 6. Your rights

In accordance with applicable laws, you have the following rights::

Right of access: You can request information about the data that we store about you.

The right to correction: You can request correction of inaccurate data.

Right to erasure ("right to be forgotten"): You can request the deletion of your data if it is no longer needed for the purposes for which it was collected.

Right to restriction of processing: You can restrict the use of your data in certain cases.

Right to data portability: You can request the transfer of your data in a structured format.

Right to object: You may object to the processing of data for certain purposes.

To exercise these rights, contact your organization's administrator or contact us at: info@binkyacademy.com . We will respond to your request within a reasonable time (usually within one month). If the request is complicated, we will notify you of the need for additional time.

If you believe that your rights have been violated, you can file a complaint with the relevant data protection authority in your country.

## 8. Saving data

We only store your data for the period necessary to:

Ensure the operation of the Application;

Application Functionality Improvements;

Ensuring security;

Compliance with legal obligations.

After termination of use of the Application, the data is deleted, except in cases where their storage is required by law (for example, for archival purposes or in connection with legal claims).

# 9. Changes to the Privacy Policy

We may update this Privacy Policy to reflect changes in legislation or Application functionality. We will notify you of the changes via the App or by email, if we have one. The date of the last update is indicated at the beginning of the document.

## **10. Contact Information**

If you have any questions or comments about this Privacy Policy, please contact us.:

Game Tunes

Email address: info@binkyacademy.com