

# Privacy Policy

Version 1.0

Last updated December 15th, 2024.

InGame Dynamics (IGD) is acting as the data controller, a limited liability company incorporated in Latvia, with its legal address at Graudu Street 68A, Riga, Latvia.

We value your privacy and want to introduce you to our policy which outlines what kind of information we collect and how we process this data.

Terms “Personal data” or “Data” means any information that is related to an identified or identifiable natural person.

“Data controller” means the person that determines the purposes and means of the processing.

This policy is applicable to all of our applications.

## Data we collect.

With your consent which is given through our applications, we might collect and process the following data in its entirety or in part when you use our applications.

- IDFA publicity identifiers (for IOS devices) and GAID (for Android devices)
- Data that enables us to see the way in which you interact with our applications (for instance, how and when you use our applications) and with the publicities we display (for instance, time spent in the application, clicks made etc.)
- Data pertaining to your geographical position (IP address)

This data is collected with external tools which are known as Software Development Kits (SDK). SDK's are developed by our partners and implemented in our applications by IGD, which are an integral part of all applications we distribute.

List of our partners SDKs that might be integrated in our applications (varies from application to application):

- Games Analytics (analytical SDK)
- Facebook Analytics (analytical SDK)
- AppsFlyer (analytical SDK)
- AppLovin (SDK advertising)
- Admob (SDK advertising)
- Vungle (SDK advertising)
- UnityAds (SDK advertising)
- Ironsource (SDK advertising)
- Adcolony (SDK advertising)
- Facebook Audience Network (SDK advertising)

IGD does not knowingly collect any personal data concerning children under 15 years old.

## **Purposes and legal basis of processing data.**

Data collected by IGD is used to:

- Distribute our applications
- Perform relevant updates and maintenance of our applications
- Collect data for ideas for new application development
- Provide relevant advertisements tailored to your interests (SDK advertising)
- Make statistics on your use of our applications, for example number of games played, session length and advertisements you are watching, which makes it possible for us to improve your gaming experience (analytical SDK).
- Communicate with you (in an event if you contacted IGD by any means whatsoever)

Please note that the information we collect is collected only after you grant us permission to do so through a “pop up” prompt in our applications.

You are able to withdraw your consent at any time from the "Settings" page in our applications. (If there are no "pop up" prompts or privacy setting in our application that means we are not collecting your personal data through that application)

## **Storing the data.**

IGD stores your personal data for a maximum of 12 months after collection. Beyond this term, data will be rendered anonymous and stored solely for statistical use and will not be used in any other way.

## **Recipients of data.**

The recipients of the Data are the partners mentioned above in section named "Data we collect". IGD request that our partners act in compliance with Data protection legislation and best practices of confidentiality of this Data. Any sub-contractor who may process this personal data for IGD undertakes as follows:

- solely to process data for the purpose which are contracted,
- to process data in accordance with IGD instructions,
- guarantee the security of Data received.

IGD may also disclose your personal data to third parties in the following cases:

- If IGD is obligated to do so by law or request of competent government authority.
- if the data is necessary for national security, application of legislation or any other matter of public interest;
- in the event of restructuring, transfer, merger or sale of IGD or application to the third party concerned.

## **Data transfer.**

In the event that Data is transferred outside of the European Union, IGD ensures the following:

- the Data is transferred to countries recognised as offering an equivalent level of protection
- Personal data is transferred by using entities that are certified under the Privacy Shield program
- For personal data transferred outside of countries recognised by the Data State Inspectorate as having a sufficient level of protection, the data is transferred in accordance with appropriate data protection legislation provisions

## **Your rights concerning data collected**

You have the following rights regarding the Data IGD collects:

- Right to confirmation of the existence of a data processing
- Right to access your Data
- Right to request rectification of your Data if incorrect.
- Right to request deletion of your Data

You may request deletion of your Data in the following cases:

- Data is no longer necessary for the purposes it was collected
- you withdraw your consent of the Data processing
- you object to processing (in case there is no legitimate reason for processing)
- you consider that your data has been processed in unlawful manner
- Data should be deleted for legal reasons
- Right to limit processing

You may request IGD to limit the use of your data in accordance with the following:

- objections of accuracy of the Data

- you have reasonable grounds to believe that the data processing is unlawful and you object to the deletion of the Data
- data is still required for legal reasons - such as defending your rights in court
- you have the right to object to processing by withdrawing your consent (this does not affect the legality of Data processing based on the consent granted prior to its withdrawal),
- The right to benefit from data mobility
- Post-mortem guidelines
- Right to make a complaint to the Data State Inspectorate

You are entitled to reclaim your data provided to IGD, in a structured format, commonly used and machine-readable.

If you consider that IGD has not abided by the privacy data legislation, at any time you may issue a complaint to the competent authorities.

Authority in Latvia - <https://www.dvi.gov.lv/en/>.

Terms for exercising rights

You may exercise your rights by sending an email to the following address: [info@igdynamics.io](mailto:info@igdynamics.io)

Please be advised that your request will be processed if you provide proof of your identity, notably by producing a scanned copy of a valid identity document or a signed photocopy of a valid identity document.

IGD will determine if the request is admissible in one month's time. In the event that the submitted request is acceptable IGD will provide answer to the request in one month's time. In case the answer to the request needs more time we will notify you of the deadline extension up to two months.

IGD reserves the right to object to requests which are clearly abusive (in their number, systematic or general nature).

In the event that your request has been refused IGD will notify you and explain the grounds for refusal in one month's time. Please take notice that the abusive nature of the request will be reported to the competent authorities.

## **Personal data security**

We take reasonable security measures to insure the security of the collected Data.

If illegal access to your Data will be detected, IGD takes up responsibility to secure this data and inform you and competent authorities in a timely fashion.

## **Updating the privacy policy**

This privacy policy may be updated at any time, we invite you to check up on this page regularly.