

Privacy Policy

About Us

Galina Ozerina develops and publishes game titles for mobile devices (each game title, "Title").

We collect information in either of 2 ways:

Directly – through the Titles. For this purpose, we also engage with analytics partners that collect the information on our behalf.

Indirectly– through our advertising and analytics partners.

We collect information as described in this privacy policy for Galina Ozerina own purposes, as a data controller under data protection law where relevant.

Scope

This privacy policy describes Galina Ozerina privacy practices with respect to information I processes in relation to its Titles. The titles are available to users all around the world.

Accordingly, throughout the document, we try to harmonise our approach and the language of the privacy policy as much as possible. However, sometimes we refer to specific laws that require further disclosures. For example, whenever you see throughout the policy the annotation "The GDPR angle", it means that the purpose of such section is to satisfy the transparency requirements of the General Data Protection

Regulation (the “GDPR”), and therefore it applies only to personal data (as defined by the GDPR) associated with devices who we deem to be located in the European Economic Area, United Kingdom, or Switzerland. If you are a resident of California, Virginia, Connecticut, or Colorado, please see “State Privacy Rights” section of this privacy policy for information related to privacy laws in these states.

Information We Collect

Information collected through our Titles, and information provided to us by advertising and analytics partners:

- Identifiers:
 1. Advertising ID – Advertising ID refers to the Google Advertising ID (“GAID”) on Android devices, or ID For Advertising (“IDFA”) on iOS devices. The Advertising ID is a resettable persistent identifier generated by Android or iOS that allows online advertising companies to recognize a device across apps, for advertising purposes. Additional information about how to limit our use of the Advertising ID can be found under “How to Control Information”.
 2. IP address of the device.
 3. A unique ID generated by our advertising partners to recognize a device in a specific Title.
 4. ID of a device which is unique only to our Titles.
- General technical information about a device – Technical information such as:
 1. The device type and language, operating system name and version.

2. The device's time zone.
 3. The amount of free memory on the device.
 4. The name and version of the Title.
 5. Battery status.
 6. The name of the mobile carrier.
 7. The device's internet connection type (e.g., Wi-Fi).
- Activity in connection with the Title: Transactions and in-app purchases made in the Title, progress or movement in the Title, and in-game events.

Information received from advertising and analytics partners:

1. Campaign information – An indication if an ad of a Title was viewed or clicked.
2. The total amount of revenues received as a result of advertising served to a specific device.

How We Use the Information We Collect:

We use the information we collect mainly to provide services to players of our Titles. In addition, we use the information for the following purposes:

- to improve and optimise the Titles and our players' experiences;
- to provide players with information about our Titles, including in-game updates, new Titles, and promotional offers;
- to provide technical support;
- to protect the safety and well-being of our players;
- to protect Galina Ozerina rights and property in connection with the Titles;
- to prevent fraud or potentially illegal activities;

- to manage and deliver advertising, including for the purpose of analytics, measuring the effectiveness of ads, limiting the number of ads served, generating aggregated reports, and attribution;
- to administer rewards, or other promotional activities or events sponsored or managed by us or our business partners;
- to conduct marketing campaigns across our advertising and marketing partners, including campaigns that use audience lists created based on player interactions with the Titles;
- to comply with our legal obligations, resolve any disputes we may have with players, and to enforce our agreements with third parties;
- to conduct research.

The GDPR Angle:

Under the GDPR, we rely on the following legal basis for the processing of personal data:

- We process personal data for providing services to players of our Titles for the performance of our contract with them.
- We process personal data for the purposes of preventing fraud or potentially illegal activities, protecting our rights and property, serving advertising (except for personalised advertising), conducting marketing campaigns (except for audience lists based campaigns), improving and optimizing the Titles, providing information and promotional offers to players of our titles, administering rewards and conducting research, based on our legitimate interests.

- We, or our advertising partners, may process personal data for the purpose of serving personalised advertising, game usage analytics, or conducting marketing campaigns based on audience lists and creating such audience lists, if we, or our advertising partners, obtained that player's consent.
- We may also process your personal data for compliance with applicable legal obligations.

Maximum Information Retention Period:

We store information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy policy, for a maximum period of one year from its collection. In some circumstances we may store information for longer periods of time, for instance when the information is required for us to establish or exercise our rights or to defend against legal claims.

How We Share Information:

We share information with:

Other advertising partners – for the purpose of receiving, or delivering, advertising campaigns from such advertising partners.

Our corporate affiliates – from which we receive services, such as IT, security, storage, and other internal operations.

Advertisers – for the purposes of attribution.

Analytics partners – for the purpose of receiving analytics services.

Service providers – We share your information with our service providers for the purpose of receiving services such as fraud detection and prevention, analytics, reporting, and storage.

We may also disclose information if we have a good faith belief that disclosure of such information is reasonably necessary to:

1. Comply with any applicable law, regulation, legal process or governmental request.
2. Enforce our agreements and policies, including investigations of potential violations thereof.
3. Investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues.
4. Establish or exercise our rights to defend against legal claims.
5. Prevent harm to the rights, property or safety of us, our users, yourself or any third party.
6. Collaborate with law enforcement agencies or in case we find it necessary to enforce intellectual property or other legal rights.
7. When we are undergoing any potential or actual change in control, including by means of merger, acquisition, or purchase of all or substantially all of our assets.

8. **How to Control Information:**

Collection of device data – Updated versions of iOS, and Android, enable you to control how apps can collect the Advertising ID. please follow the below instructions:

iOS devices (iOS 14+): go to Settings > Privacy >

Tracking > Allow Apps to Request to Track. Please note

that if you use more than one device, you need to opt-out separately in each device

Android devices: Please follow the instructions set forth at: <https://support.google.com/ads/answer/1660762> (under Mobile Controls). Please note that if you use more than one device, you need to opt-out separately in each device.

The GDPR Angle:

Withdraw consent – You have the right to withdraw the consent you provided to us from within each of our Titles (this will affect only our processing within the specific Title), or by following the instructions above on how to control collection of device data (this will affect our processing of data in all our Titles on your device).

Data subject rights – Please note that you have the right to request from us access to and rectification or erasure of your personal data we process as controllers, or to restrict or to object to processing of your personal data in accordance with the provisions of the GDPR. To submit a request for exercising your rights, please send an email with your request to the following address:

me@sperev.ru. Please note that we will process your request subject to verification of your identity.

Complaint to supervisory authority– You also have the right to file a complaint with the relevant supervisory authority (e.g., of your country or domicile) where Galina Ozerina has not addressed your concerns.

Third-Party Services

Our services may link to other websites or mobile apps.

Please be advised that we are not responsible for the privacy practices of such other websites or mobile apps as those may have different privacy policies and terms of use

and are not associated with us. You agree that we cannot control these websites and/or mobile apps and we shall not be responsible for any use of such websites and/or mobile apps.

International Transfers:

We store information that we collect from your device on our service providers' servers in the United States.

Accordingly, please note that if you do not live in the United States, we will transfer your information to and store it in, the United States.

The GDPR Angle:

Galina Ozerina is based in Spain, which is considered by the European Commission to be offering an adequate level of protection for the Personal Information of EU Member State Residents.

We will transfer personal data to third parties located outside of the European Economic Area, the United Kingdom, or Switzerland based on standard contractual clauses. You can ask us for a copy of these clauses by contacting us through the below contact details.

State Privacy Rights

California, Virginia, Connecticut and Colorado residents have certain rights under state privacy laws with respect to personal data we collect. If you are a resident of such states, this section of the privacy policy contains disclosures required by law and explains rights that may be available to you.

Categories of Sources – As described in the "About Us" Section above, we collect personal data from the following categories of sources:

1. Directly through the Titles.
2. Advertising partners.

3. Analytics partners.

9. Our Purposes for Processing Personal Data – We use and disclose the personal data we collect for our commercial and business purposes, as further described above in the “How We Use the Information We Collect” and the “How We Share Information” Sections.

Recipients of Personal Data – Although we do not sell personal data for monetary consideration, we do sell personal data under the definition of “sale” in state privacy laws (including sharing for targeted advertising purposes), subject to our players’ choices with respect to such “sale”, to the categories of third parties listed below:

1. Advertising partners.
2. Analytics partners.

10. Your Rights Regarding Personal Data – Residents of certain states have rights with respect to the personal data collected by businesses like Galina Ozerina. You may be able exercise the following rights regarding your personal data, subject to certain exceptions and limitations:

1. The right to confirm whether we are processing personal data about you.
2. The right to correct inaccuracies in the personal data we have collected about you.
3. The right to know the categories and specific pieces of personal data we collect, use, disclose, and sell about you, the categories of sources from which we collected personal data, our purposes for collecting or selling personal data, the categories of personal data that we have sold (including for targeted advertising purposes) or disclosed for a business purpose, and

the categories of third parties to which we have disclosed personal data.

4. The right to request that we delete the personal data we maintain about you.
5. The right to opt out of our sale and sharing of your personal data, including for targeted advertising purposes. Please note that if you opt out of certain practices, we may be unable to provide you with some services.
6. The right not to receive discriminatory treatment for the exercise of the above privacy rights.

While some states provide residents with rights related to “sensitive” personal data, Galina Ozerina does not collect this type of personal data.

Exercise your rights – To exercise your rights, please contact us by sending an email to me@sperev.ru. Depending on your state, if you have submitted a request that we have not fulfilled, you may contact us to appeal our decision by sending an email with the subject line “Appeal” to me@sperev.ru.

Verification Process and Required Information – Note that we may need to request additional information from you to verify your identity or process your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your email address, and your state of residence. We will also collect information that identifies your device when you submit a request in order to help us verify your identity.

Authorized Agent – You may designate an authorized agent to make a request on your behalf by verifying your identity and providing the agent with written permission to make the request on your behalf.

Changes to This Privacy Policy:

We may revise this Privacy Policy from time to time. The most

current version of the policy will govern our processing of your information and is posted here. If we make a change to this policy we will post the revised Privacy Policy to here.

Contact Us

Galina Ozerina.

me@sperev.ru

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