

Privacy Policy

Overview

- **How to contact us**

If you have any questions about our data practices, your rights or have any concerns or complaints, you can contact us at k.andruhovich@gmail.com.

- **Personal information we collect**

We collect personal information about your use of the Game, including game play and log data. We also receive information from other third parties, such as transaction information.

How we use your personal information

We use your information to provide you with, support and analyze your use of, and improve, the Game. We will also use your information to respond to your questions. If you consent, we will send you push notifications and show you ads in our Game that may be of interest to you. You can choose to stop receiving these at any time, by opting out or changing your browser or device settings.

Who we share your personal information with

We rely on third parties for the purposes set out in the Policy, such as the provision of game servers and game analytics. We also work with certain advertising partners to show you ads. Additionally, we share some of your information with other entities of our group, and as required by law.

- **Your rights**

You may have rights to access, receive a copy of, or delete, your information or restrict processing of your Information, and you also have the right to object to our use of your information for certain purposes, including tailored marketing and advertising. You can exercise some of these rights through the Game.

- **Changes to the Privacy Policy**

If there are any significant changes to this Policy, we will notify you through the Game.

Introduction

This privacy policy (“**Policy**”) informs you of your choices and our practices in relation to your Information (as defined below). For the purpose of this Policy, “**Information**” means any

information relating to an identified or identifiable individual. This includes Information relating to your use of our mobile and online games (the “**Game**”), and any information you may additionally provide to us, e.g. when reaching out to us with a question. When you use the Game, you accept our rules and policies which set out how we handle your Information, and you understand we collect, process, use and store your Information as described in this Policy. **If you do not agree with this Policy, you must not play the Game. If you change your mind in the future, you must stop playing the Game and you may exercise your rights in relation to your Information as set out in this Policy.**

1. **PERSONAL INFORMATION WE COLLECT**

2. We will collect and use the following Information about you:

- **Information you provide to us:**
 - **Information collected via our customer support channels:** For example, when you contact us by email, we will receive information you provide to us such as (a) your full name and, and (b) any information you choose to provide to allow us to assist you.
- **Information we automatically collect or is generated about you when you play the Game:**
 - **Identifiers:** Such as your IP address, device and app ID, unique Game ID and device information (such as model, brand and operating system).
 - **Information regarding your use of the Games:** Such as date and time stamps of game events, interactions with our teams and ad engagement, and transaction records, or evidence of you using cheating software or using of modified versions of the Games.
- **Information received from third parties:**
 - **Information from payment processors:** When you make payments in our Game, we receive information from our payment processors about your transactions, including your Apple ID number for Apple, your postcode and state for Google.
 - **Analytics information:** We integrate analytics software from Google, and Unity Technologies (a US and Finnish company), third party analytics providers. They provide reports that help us optimize our in-game features and events to each user of our Game, which include your user ID and information on your in-game activity.
 - **Information collected from advertising partners:** We receive information from Unity Technologies. This includes user ID and information on your interactions with advertising shown in on our Games.
 - **Information from mobile measurement partners:** We receive information from third parties to allow us to track performance of our marketing campaigns and to detect fraud in such campaigns. This includes advertising ID, IP address, location and transaction information.

3. **Children**

Our Games are not targeted at children. Where Children under 12 use our Games, we advise that they obtain the permission of a parent or guardian, and we recommend that parents or guardians clear their browser cache of cookies and take

all other steps highlighted in this policy to minimize the data collected. In some of our Games, you will have reduced functionality if you are under 12 and are based in the EEA.

4. HOW WE USE YOUR PERSONAL INFORMATION

We use your Information to:

- **Provide you with the Game:** In particular, we will use your Information to perform our contractual obligation towards you to allow you to create an account, play the Game and remember your progress, allowing you to play the Game with others and to allow you to make purchases via Google Play or IOS App Store and maintain a record of such purchases. The Information we process when doing so includes your registration information, information you provide to us when playing the Game, identifiers, information you generate and display when playing the Game, and information regarding your use of the Game such as transaction records.
- **Improve and monitor Game use:** It is in our legitimate interests to improve our Games for our customers. When doing so, we may collect information we automatically collect or is generated about you when you play the Games, as well as non-personal information about your device such as battery, Wi-Fi strength, device manufacturer, model and operating system, and the amount of free space on your device.
- **Provide you with support and to respond to your requests or complaints:** If you reach out to us for support, we will use your Information to create a support account for you, respond and resolve your queries and complaints, facilitate support (e.g. retrieval of a forgotten password). When doing so, we perform our contractual obligation towards you. The Information we process when doing so includes your registration information, your identifiers, non-personal information about your device such as your Wi-Fi strength and the amount of free space on your device, and any other information about you collected via our customer support channels.
- **Conduct analytics:** It is in our legitimate interests to analyze the use of and inform, our Games, newsletters and advertising campaigns, and any other interaction or interest in the same. When doing so we will process information we automatically collect or is generated about you when you play the Games or interact with our newsletters and advertising campaigns to (a) create anonymised and aggregated data; (b) create segments of users who show particular characteristics or interests; and (c) conduct predictive analytics about your interests.
- **Send you updates about in-Game offers and our other products and services that may be of interest to you:** We will send you promotional offers, and information about other products and services that may be of interest to you. Where it is required, we will only do so where we have your consent. We do so via email, push notification or in Game. When doing so, we process your registration information and the analytics information above. Your consent can be withdrawn at any time by following the unsubscribe mechanism at the bottom of each communication for emails or by adjusting your device settings for push notifications.

- **Provide you with advertising:** We will present you with ads and suggestions in our Game and elsewhere. These may be ads relating to our own games or other services you may be interested in. Depending on your consent, or device settings, these ads and suggestions may be tailored. If you no longer want to receive targeted advertising in the Game you can opt-out in the Game. To stop receiving ads about our products and services elsewhere you can change your device settings. To tailor ads and to allow our advertising partners to tailor ads, we process information we automatically collect or is generated about you when you play the Game and information received from third parties.
- **Prevent fraud, defend us against legal claims or disputes, enforce our terms and to comply with our legal obligations:** It is in our legitimate interests to protect our users against online abuse and other anti-social or illegal activity. Furthermore, it is also in our legitimate interest to protect our interests by (1) monitoring Game use to detect fraud or any other user behavior which prejudices the integrity of our Games, (2) taking steps to remedy aforementioned fraud and behavior, (3) defending ourselves against legal claims or disputes, and (4) enforcing our terms and policies. When doing so, we will process the Information relevant in such a case, including information you provide us, information we automatically collect about you, and information which is provided to us by third parties.

5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share your Information with selected third parties, including:

- **Vendors and service providers we rely on for the provision of the Games,** for example:
 - **Cloud service providers who rely on for data storage,** including Amazon Web Services and Google Cloud that are based in the U.S.
 - **Customer support solution providers,** who help us manage and respond to our customer questions and complaints. This includes Zendesk Inc., who are based in the U.S. and who host our customer support function.
 - **Analytics providers,** we work with a number of analytics, segmentation and mobile measurement service providers who help us understand our userbase. This includes Appsflyer Ltd, who are based in US.
 - **User acquisition,** we work with a variety of user acquisition partners to help us report on the success of our marketing campaigns. We may use some of your personal information to participate in Custom Audience and Lookalike Audience programmes, which enable us to display adverts to both existing and prospective supporters when they visit one of our partners' websites. We may provide an identifier (i.e. your Advertising ID or Facebook ID) to them so they can determine whether you are a registered account holder with them. Our adverts may then appear when you access their websites. See our list of partners.

- **Advertising partners.** We are an ad-supported service. Subject to your settings, we provide certain Information to advertisers who will use them to serve you with ads in our Games, and we measure who sees and clicks on their ads. We also share advertising identifiers, along with the interests or other characteristics of a device or the person using it, to help partners decide whether to serve an ad to that device or to enable them to conduct marketing, brand analysis, personalise advertising, or similar activities.
- **Payment processors.** We use our platforms as payment processors, i.e. Google (if you run Android on your mobile device), and Apple App Store payments (if you run IOS on your mobile device). These payment processors are responsible for the processing of your Information, and may use your Information for their own purposes in accordance with their privacy policies.
- **Law enforcement agencies, public authorities or other judicial bodies and organisations.** We disclose Information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to comply with a legal obligation, process or request; enforce our terms of service and other agreements, policies, and standards, including investigation of any potential violation thereof; detect, prevent or otherwise address security, fraud or technical issues; or protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection).

6. **Third Party Privacy Practices**

If you access the Game through a third-party platform such as Facebook (“**Third Party Services**”), you must understand that those Third Party Services may collect other information about you (including information you share with them directly or about your use of the Game) in accordance with their own terms and privacy policies. The privacy practices described in this Policy do not apply to Third Party Services. Any links in the Game to Third Party Services do not imply that we endorse or have reviewed the Third Party Services.

7. **Security**

Although we have in place security measures to maintain the privacy and integrity of your Information, unfortunately, the transmission of Information via the internet is not completely secure. Although we will do our best to protect your Information, we cannot guarantee the security of the Information transmitted to us through the Game or otherwise. Any transmission of your Information is at your own risk. We may also take extra steps to protect your Information and minimise the Information we process.

8. **WHERE WE PROCESS YOUR PERSONAL INFORMATION**

Your Information will be processed by our employees and service providers in the European Economic Area (“EEA”) and the United Kingdom. Because countries outside of the EEA may have different data protection laws, we take steps to ensure that where your Information is transferred outside of the EEA, such transfers are protected by adequate safeguards, including the standard contractual clauses approved by the European Commission, and the EU-U.S. Privacy Shield scheme for transfers from the EEA and the UK to the U.S.

9. **HOW LONG WE STORE YOUR INFORMATION**

Your Information is kept for as long as you are registered and using our Game, and then for up to three years from the date you stop interacting with the Game. Some information we collect will be stored for longer where we have an overriding legitimate interest to retain such information (for example, information on suspicious behaviour of certain users of our Game, about users which are banned from using the Game, and transaction records).

YOUR RIGHTS

10. If you are based in the EEA, Switzerland or are a legal resident of California in the U.S., you have certain rights in relation to your Information. For EEA and Switzerland based, you will find more information below on when which rights can apply.

To exercise your rights, please follow the procedure set out below or email us at k.andruhovich@gmail.com.

- **Access.** You have the right to access Information, and to receive an explanation of how we use it and who we share it with. This right is not absolute. For example, we cannot reveal trade secrets, or give you Information about other individuals. You can exercise this right by emailing us at k.andruhovich@gmail.com with details of what Information you would like access to.
- **Erasure.** If you would like us to erase your Information, you can do so by contacting us at k.andruhovich@gmail.com. We may need to retain some of your Information where there are valid grounds for us to do so under data protection laws. For example, for the defence of legal claims, respect freedom of expression, or where we have an overriding legitimate interest to do so, but we will let you know when this is the case. Note that where the Information is held by a third party data controller, such as an advertising partner or a payment processor, we will use reasonable steps to inform them of your request, but we recommend you contact them directly in accordance with their own privacy policies to ensure your personal data is erased.
- **Objection and withdrawal of consent.** You may have the right to (i) withdraw your consent where you previously provided such consent; or (ii) object to our processing of your Information where we process such Information on the basis of our legitimate interests (see above under **How we use your Information**). You may exercise this right as follows:
 - **To stop receiving targeted advertising:** withdraw your consent through the Game Settings.
 - **To stop receiving push notifications:** please change your device or browser settings.
- **Portability.** You have the right to receive a copy of Information we process on the basis of consent or contract in a structured, commonly used and machine-readable format, or to request that such Information is transferred to a third party.
- **Correction.** You have the right to correct any Information held about you that is inaccurate.
- **Restriction.** You have a right in certain circumstances to stop us processing Information other than for storage purposes.

11. CONTACT & COMPLAINTS

We welcome questions, comments and requests regarding this Policy. These should be addressed to k.andruhovich@gmail.com.

12. CHANGES

Any updates or changes to this Policy will be published here. If there are any significant changes, we will notify you through the website or in-Game.

13. ADVERTISING AND USER ACQUISITION PARTNERS

We use the following user acquisition and advertising partners, that are integrated into some or all the Games. Please check the following privacy policies to learn more about their privacy practices, including how you may exercise your data subject rights.

This list was last updated on 07 September 2022.

- **AdColony:** <https://www.adcolony.com/privacy-policy/>
- **AdMob (Google):** <https://policies.google.com/technologies/partner-sites>
- **Amazon:** <https://aps.amazon.com/aps/privacy-policy/>
- **Applovin:** <https://www.applovin.com/privacy/>
- **Appsflyer:** <https://www.appsflyer.com/privacy-policy/>
- **Chartboost:** <https://answers.chartboost.com/en-us/articles/200780269>
- **Facebook:** <https://www.facebook.com/policy.php>
- **Fyber:** <https://www.fyber.com/legal/privacy-policy/>
- **Index Exchange:** <https://www.indexexchange.com/privacy/>
- **InMobi:** <https://inmobi.com/privacy-policy/>
- **Instagram:** <https://help.instagram.com/519522125107875>
- **ironSource:**
<https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
- **Loopme:** <https://loopme.com/privacy/>
- **OpenX:** <https://www.openx.com/legal/privacy-policy/>
- **PubMatic:** <https://pubmatic.com/legal/privacy-policy/>
- **Smaato:** <https://www.smaato.com/privacy/>
- **Snapchat:** <https://snap.com/en-US/privacy/privacy-policy>
- **Startapp:** <https://www.startapp.com/policy/privacy-policy/>
- **Rubicon Project:** <https://rubiconproject.com/privacy/>
- **Tapjoy:** <https://www.tapjoy.com/legal/#privacy-policy>
- **Unity Ads:** <https://unity3d.com/legal/privacy-policy>
- **Vungle:** <https://vungle.com/privacy/>
- **Frameplay:** <https://www.frameplay.gg/terms#Policy>

14. CALIFORNIA PRIVACY RIGHTS

The terms of this Addendum apply to residents of California under the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time ("CCPA"). For the purposes of this addendum, Personal Information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or

household, or as otherwise defined by the CCPA. Personal Information does not include information that is: lawfully made available from government records, de-identified or aggregated, or otherwise excluded from the scope of the CCPA.

15. Collection and Disclosure of Personal Information

Over the past 12 months, through your use of the Games, we may have collected and disclosed the following categories of Personal Information from or about you:

- Identifiers, including name, email address, IP address, device identifiers and advertising ID. This information is collected directly from you or your device. If you have registered through a third party account (Apple, Facebook, or Google), we may have also collected from those third party services your third party ID, name, and avatar.
- Internet or other electronic network activity information, including your use of in-game features and events and information on your in-game activity, and information on your interactions with advertising shown in on our Games. This information is collected from our selected third party analytics providers and advertising partners.
- Geolocation data, including city level location data. This information is collected directly from you or your device and from third party services when you register through them.
- Commercial information, including records of products or services purchased, obtained, or considered, your Apple ID number for Apple, your postcode and state for Google and user ID. This information is collected directly from you or your device, and from our payment processors.

In the preceding twelve months, we have collected Personal Information from the following categories of sources:

- You/Your Devices directly.
- Advertising Networks and other advertising partners.
- Analytics Providers.
- Social Networks, to the extent this applies to you and within the limits of your permission.

We collect personal information for the following purposes:

- To operate and administer the Games;
- To improve the Games;
- To communicate with you;
- To serve advertising;
- For security and verification purposes, including to prevent and detect fraudulent activity;
- To address and remediate technical issues and bugs.

For additional information about what each type of personal information is used for, see **“How We Use Your Personal Information”** in the main portion of the Privacy Policy.

We may disclose personal information to the following types of entities:

- Our affiliate companies within our corporate group who process personal information in order to operate the Games;
- Marketing and advertising partners who use your information to serve you ads in the Games and on other sites;
- Other companies that provide services on our behalf who are prohibited by contract from retaining, using, or disclosing personal information for any purpose other than for providing the services to us;
- Regulators, judicial authorities and law enforcement agencies;
- Entities that acquire all or substantially all of our business.

For additional information about how we disclose personal information is used for, see **“Who we share Your Personal Information With”** in the main portion of the Privacy Policy.

SALES OF PERSONAL INFORMATION / NOTICE OF RIGHT TO OPT-OUT

Over the past 12 months, we have used third party advertising and other tracking technologies on our Games to collect information about you, your device(s), and your use of our Games. We share that information with selected third parties such as advertising partners who use it to target advertisements to you online.

You can opt-out and exercise control over the use of these technologies at any time by using the in-app settings.

Rights under the CCPA

The CCPA provides California residents with certain legal rights; these rights are not absolute and are subject to certain exemptions. If you are a California resident, and the CCPA does not recognize an exemption that applies to you or your personal information, you have the right to:

- Submit a verifiable request for the following information covering the 12 months preceding your request:
 - the categories of Personal Information about you that we collected, sold, or disclosed;
 - the categories of sources from which the Personal Information was collected;
 - the purpose for collecting or selling Personal Information about you;
 - the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - the specific pieces of Personal Information we collected about you;
- Submit a verifiable request that we delete Personal Information we collected from you; and
- Be free from unlawful discrimination for exercising your rights, including providing a different level or quality of services or deny goods or services to you when you exercise your rights under the CCPA, subject to certain limitations.

We aim to fulfill all verified requests within 45 days pursuant to the CCPA. If necessary, extensions for an additional 45 days will be accompanied by an explanation for the delay.

How to Exercise Your Rights

You can exercise your rights of "do not sell my data" by opting out of Targeted Ads in the app settings or by emailing us at k.andruhovich@gmail.com

This privacy policy was last modified on 18 January 2023