

This Privacy Policy was executed by and between Ponyom Games as the “Data Controller” and you. In this context, the purpose of this Privacy Policy is to provide information on the collection, processing and use of the data provided by you in connection with the use of Ponyom Games’s Games as well as the grade, purpose and scope of transfer thereof. The purpose of this privacy notice is to provide you with information regarding the processing of personal data of the users that use our games/applications (Referred to as “Games” together). When you use the Games; or somehow communicates with Ponyom Games, Ponyom Games collects information about you in accordance with the nature of the information and transaction within the current technical possibilities. You accept, acknowledge and promise that your personal information and data might be used in limited manner by Ponyom Games and/or through Ponyom Games to the extent that it is limited to the format and purposes set forth in this Privacy Policy. Every type of information related to an identified or identifiable natural person constitutes personal data. Processing your personal data signifies all types of transactions performed on the data such as; obtaining, recording, storing, preserving, altering, re-arranging, disclosing, transferring, acquiring, making accessible, alignment and preventing access.

1. The purposes of collecting and processing personal data

Ponyom Games collects your personal data automatically whenever you download our Games to your device or play the Games, whenever you send us your feedbacks or convey your information or support requests directly to Ponyom Games or interact with third party advertisements presented in our Games or interact with Ponyom Games advertisements presented in other platforms. In general, the information we collect about you relates to your device and helps us to identify your device. Ponyom Games also collects data from the Apple App Store and Google Play App Store (Referred to as “Platforms” together) platforms and the business partners. Ponyom Games might collect the your personal information (user name, name if provided, IP address, the date and time of access, the pages accessed while being on Game) and the activities taken place under Ponyom Games in order to provide better service to you, to make suggestions, to improve its services, to facilitate the use of Games at the works related to your interest and preferences, within the framework of legal legislation.

- Personal data that is collected while you are playing Ponyom Games’s Games:
Ponyom Games might collect the your personal information and the activities taken place under Ponyom Games in order to provide better service to you, to make suggestions, to improve its services, to improve and update our Games, to facilitate the use of Games at the works related to your interest and preferences, within the framework of legal legislation.

When you download and/or play the Games via Platforms, Ponyom Games collect certain personal data from you and/or your device. In this regard, Ponyom Games collect your advertising ID (IDFA for IOS devices and GAID for Android devices), other device identifiers (IDFV for IOS devices), device identifier, operating system, model, producer information, hardware type, operating system version, memory usage, country, time zone and preferred language information, internet protocol (IP) number, location information according to your IP address, operator and browser information, information about properties of mobile application through which a consumer interacts with the Games, data regarding your in-game interactions (the time you spent while playing our games, your in-game expenses, level information, the amount of time for watching advertisements, the advertisements watched) and time of installation and first opening of the application.

The aforementioned advertising IDs (IDFA and GAID) are unique identifiers for mobile devices that advertisers use for personalized advertising and consistent across all mobile applications and thus allow cross-app tracking. You may disable this option by activating “limit advertisement tracking” from the privacy settings of Apple devices. As for the Google Android devices, you may change your advertisement setting by activating the “disable advertisement personalizing” option. Advertising IDs, are non-permanent identifiers, which are uniquely associated with your device.

We would like to remind that you have an option to play the Games without watching advertisements by using our no-ads feature, which is subject to a fee.

Your user name and score can be viewed by other users in our games that include a scoreboard feature. Payments for in-app purchases are being carried out by the Platforms. Ponyom Games, does not collect personal data such as your name, surname, credit card number and e-mail address that you share with the Platforms for the payment, and only payment information for the items your purchase is being shared with us in order to fulfil your order.

- Personal data that is collected when you contact with Ponyom Games
 - When you contact with us:
We may ask for contact information (e-mail) when you request information about our Games, request technical support or contact with us anyhow. Your contact information will be processed for the purposes of fulfilling your requests and communicating with you.
 - Comments:
You may share data that contains your personal data when you share your comments and views about our Games. The content of user comments is composed fully of data that you voluntarily provided. We process your shared personal data to solve the issues you encountered and to fulfil your request.
- Data that is collected by third parties
If the personal data provided to Ponyom Games by you is requested by official institutions/organizations as necessitated by the law, the data may be transmitted to the relevant authorities and courts if requested by the courts.

Our business partners or service providers can use server log files, cookies, pixel labels, web beacons or other tracking tools in our Games. Our advertisement business partners and analytics service providers mentioned in the part 3 below, can collect data regarding your IP address your advertising identifier (IDFA for IOS devices and GAID for Android devices), other device identifiers (IDFV for IOS devices), cookie identifiers, advertisement ID, your mobile device's type, operating system, version, model, hardware type, other device identifiers that are automatically determined for your device when you connect to the internet, web browser information, websites you visited, connections you have within the Games and your preferences about the visited websites by using the stated technologies. You may access to the privacy policies of these third parties from section 3.

Ponyom Games stores your data for as long as it is necessary to provide our Games and deletes it when the purposes of the data processing cease to exist. Personal data is deleted in case the reasons which necessitate processing within the context of the stated purposes in this privacy notice cease to exist and after 2 years as of the registration date of the relevant record at the latest.

- Children data
Ponyom Games never knowingly or willingly collect any personal data concerning children under 16 years of age.

2. The legal grounds of processing your personal data

he legal grounds that Ponyom Games relies upon while processing your personal data are the following:

- Explicit consent and/or your request
- In cases where it is necessary to disclose such information in accordance with applicable laws or regulations or a court judgment or administrative order issued
- Being necessary for the establishment and execution of an agreement
- Being necessary for Ponyom Games to fulfil its legal obligations as a data controller
- Being necessary for the establishment, exercise and protection of any right
- Without prejudice to your fundamental rights and freedoms, being compulsory for Ponyom Games's statutory interests

3. In data processing activities where your personal data is processed based on the explicit consent, you have the right to withdraw your consent at any time.

Ponyom Games's statutory interest in processing your device and usage data is provide better service to you, to make suggestions, to improve its services, to improve and update our Games, to facilitate the use of Games at the works related to your interest and preferences, within the framework of legal legislation.

Ponyom Games undertakes to keep the your data and any confidential information strictly private and confidential, without prejudice to the contents hereof, to regard it as an obligation to keep confidentiality, to take all measures and act in due diligence to prevent all or any part of your information from entering into the public domain or be subject to unauthorized use, or to take measures to prevent the confidential information from disclosure to any third party. If, despite all necessary data security measures taken by Ponyom Games, the confidential information is damaged as a result of attacks on the system or captured by third parties, Ponyom Games shall have no responsibility with that respect.

Ponyom Games shall not be responsible for damages caused by the use of information that you disclose in comments made or messages given by third parties in public areas. If you share your name, password, etc. used by you when creating the membership record with third parties, the Ponyom Games shall not be responsible for any damages that may arise from the information shared with third parties.

4. The transfer of your personal data
Your personal data may be transferred to our business partners and service providers located abroad for the purposes of improving our Games and providing our Games to you, providing personalized advertisements according to your interests, measuring Ponyom Games's and third parties' advertisement effectiveness and carrying out measurements and analysis regarding your use of our games. In case a public institution is authorized to request personal data by the law, your personal data can be transferred to such authorized public institution in accordance with the applicable personal data protection legislations. Requests from judicial authorities will also be fulfilled in accordance with the applicable legislation.

Your personal data may be transferred to our business partners and service providers stated below:

Analytics services. Your personal data may be transferred to our service providers and business partners for the purpose of conducting analytical reviews, analyses, reporting and research activities regarding the use of our Games.

Cloud computing services. Your personal data is stored in the servers of the Amazon Web Services.

Advertisement business partners. Your personal data may be transferred to our advertisement partners who enable the Games to be provided free or for low cost.

You may find the list of our service providers and business partners and their privacy policies below:

5. Service provider/Business Partner
6. Privacy Policy
7. Analytics services
 - o Adjust
<https://www.adjust.com/terms/privacy-policy>
 - o Facebook
<https://www.facebook.com/about/privacy>
 - o Google LLC (Firebase)
<https://firebase.google.com/support/privacy>
 - o SafeDK
<https://www.safedk.com/privacy>
 - o Game Analytics
<https://gameanalytics.com/privacy>
8. Cloud computing services

- Amazon Web Services Inc.
<https://aws.amazon.com/privacy/>
- 9. Advertisement business partners (advertisement networks)
 - AppLovin Corporation
<https://www.applovin.com/privacy/>
 - Facebook Inc. (FB Ads, FB Audience Network)
<https://www.facebook.com/about/privacy>
 - Flyer
<https://www.flyer.com/privacy-policy/>
 - Google LLC (Google Ads)
<https://policies.google.com/privacy>
 - InMobi
<https://www.inmobi.com/privacy-policy/>
 - ironSource Ltd.

<https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
 - Mintegral
<https://static.mintegral.com/document/privacy>
 - MoPub
<https://www.mopub.com/legal/privacy/>
 - Ogury Limited
<https://www.ogury.com/privacy-policy/>
 - Smaato, Inc.
<https://www.smaato.com/privacy/>
 - Tapjoy, Inc.
<https://www.tapjoy.com/legal/#privacy-policy>
 - Unity Technologies (Unity Ads)
<https://unity3d.com/legal/privacy-policy>
 - Vungle Inc.
<http://vungle.com/privacy/>
 - Apple
<https://www.apple.com/privacy/>
 - Snapchat
<https://www.snap.com/en-US/privacy/privacy-policy/>
 - Jetfuel
<https://www.jetfuel.it/privacy>
 - Appnext
<https://www.appnext.com/privacy-policy-oem-operators/>
 - Tiktok
<https://ads.tiktok.com/i18n/official/policy/privacy>
 - Persona.ly
https://persona.ly/privacy_policy
 - Instal.com
<https://www.iubenda.com/privacy-policy/417981>
- 10. Your Rights Regarding the Protection of Your Personal Data
According to the relevant legislation, you have the right to;
 - learn whether or not your personal data is being processed,
 - request information as to processing if it has been processed,
 - learn the purpose of personal data processing and whether the personal data is used appropriately in line such purposes,
 - know the third parties to which your personal data is transferred domestically or abroad,

- to request correction if your personal data is incompletely or incorrectly processed,
 - to request deletion or destruction of your personal data,
 - to request the transmission of your correction, deletion and destruction requests to third parties to whom your personal data has been transferred,
 - to object to any consequence occurred against you by analyzing your processed data through automated systems
 - request compensation in case you incur any damage due to the unlawful processing of personal data.,
 - request restriction of data processing activities,
 - request data portability,
 - object to the occurrence of an adverse consequence by analyzing the processed data exclusively through automated systems, and
 - to lodge a complaint with the relevant data protection authority and have the right to claim damages in case of impairment because your personal data is processed in violation of the relevant legal legislation.
11. You can submit all your claims and questions with respect to such rights to your requests will be answered as soon as possible and within thirty days at latest.

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