

Last updated February 14, 2023

PE KUSHCHENKO OLGA (hereinafter referred to as the “HypeMobia”) is an developer specialized in the developing of mobile games and applications.

The purpose of this policy is to provide you with all the important information and explanations about **how and why some of your data may be collected and processed by HypeMobia when you use one of our game or applications**. This privacy policy governs and details the main principles that HypeMobia applies to the data we collect and process to develop, publish and monetize mobile games and applications (“HypeMobia Apps and Games”), and this policy also aims to **remind you about your rights and to provide you with all the elements you need to exercise them**.

Should you have any questions related to this policy or our practices around privacy and data protection in general, please **don’t hesitate to contact HypeMobia Data Protection Officer** as indicated in the contact section of this policy.

HypeMobia apps and games

Why does HypeMobia collect data from its apps and games?

When you install and use HypeMobia mobile applications, we can collect and process some of your data for different legitimate purposes.

You will find below explanations regarding the reasons why HypeMobia may collect data and the legal bases HypeMobia relies on in each case.

HypeMobia collects data:

- **To provide you with the services you asked for**
(e.g., knowing that you completed the first level to allow access to the second one)
 - Legal basis – such data processing is strictly necessary for the service(s) asked
- **To run analytics and understand how users interact with our product and services in order to continuously improve it either directly or through third party partners**
(e.g. identifying that a feature is annoying for users or that a level is too difficult for most gamers)

- Legal basis for third party analytics - Express consent. In the countries where collecting users' consent may be required by applicable laws and regulations, HypeMobia only shares personal data collected through HypeMobia apps with third party partners that provide HypeMobia with analytics services once you express your consent through the pop-up notice included in our apps.
- Legal basis for first party analytics – Legitimate interest. HypeMobia collects user data for the purpose of its own internal analytics tools. Data is used for the sole purpose of HypeMobia analytics tool and is not shared with any third parties. This data processing is based on the legitimate interest of HypeMobia.
- **To serve advertising tailored to the preference and interests of our users** and allow HypeMobia to continue to provide free services and products
 - Legal basis – Express consent. In the countries where collecting users' consent may be required by applicable laws and regulations, HypeMobia only processes or shares personal data collected through HypeMobia apps for personalized advertising purposes once you express your consent through the pop-up notice included in one of our apps.

For all data processing activities that rely on users' consent, you can withdraw your consent at any time from the "settings" page in our various applications.

Please only note that in the case where you withdraw your consent or where you refuse to consent in the first place, you will still be served with advertising but that may be less relevant to you as it will not be tailored to your interests.

What data does HypeMobia collect from its apps and games?

For all the purposes listed above the data that HypeMobia collect is limited to:

- The apps you are using
- Your IP address
- Your Mobile Advertising ID (Apple IDFA or Google AAID - which are technical identifiers developed by mobile operating systems for advertising purposes which remain under your control and can be reset or erased at any time in through your device settings) and device identifier (e.g., IDFV for iOS devices and Android ID for Android devices)
- Information about the device you use and your connection (user agent, type of connection, timestamp, system language, device model, screen resolution and settings, battery level, available storage space, time zone, OS)
- Data pertaining to your activities on our applications and notably the way in which you interact with our applications (for instance, how and when you use our applications) and with the advertising served in our applications (for instance, number of ads served, potential clicks)

With who may your data be shared & why?

HypeMobia does not share your personal data with third parties without your prior consent in the countries where collecting users' consent may be required by applicable laws and regulations.

When you consent to the collection of data for advertising and analytics purpose, we may share the data listed above with the following categories of recipients:

- **Ad Partners:** that allow us to monetize the ad inventory of our apps and provide users with free products and services.

Those partners usually collect data via their own tools (Software Development Kits or “SDK”). You will find a list of our partners implementing advertising SDKs through our applications and the privacy policies of their services that describe their practices and allow you to exercise your rights directly toward them hereafter:

- Unity Ads - <https://unity3d.com/legal/privacy-policy>
- **Analytic companies:** that provide us with tools and technologies that allow us to better understand how users interact with our services and will help us improve it. Those partners also usually collect data via their own SDKs. You will find a list of our partners implementing analytical SDKs through our applications hereafter:
 - GameAnalytics - <https://policies.google.com/privacy>
- **Authorities:** only to the extent we are obliged to by applicable laws and regulations.

Security and other important information

How long does HypeMobia keep your data?

Personal data collected, received and processed for the purposes described in this policy is **not kept longer than necessary** by HypeMobia.

HypeMobia does not retain user level data for more than 13 months except for the data collected for the purpose of its **first-party analytics tool which can be stored up to 25 months** based on the guidelines of our Supervisory Data Protection Authority.

Children data

HypeMobia **never** knowingly or willingly **collect any personal data concerning children under 16** years of age.

International transfers

Some of the partners and processors referred to in this policy are located outside of the European Union.

In such case, we ensure that:

- the personal data is transferred to countries recognized as offering an equivalent level of protection or,
- For personal data transferred outside of countries recognized by the European Commission as having a sufficient level of protection, any of the mechanisms offering appropriate guarantees is used, for which provision is made by applicable regulations, and notably the adoption of the standard contractual clauses of the European Commission.

What rights do you have?

Consent withdrawal and opt-out of sale of information

You can change your consent status at any time from the Privacy Settings available in HypeMobia mobile games and applications.

Please note that if **HypeMobia does not sell the personal information of its users**, we may share it with third parties such as analytics and advertising companies in order to improve and personalize your experience and adapt the content and ads of our services.

Adjusting your consent settings within HypeMobia apps and games, will allow you to **block the collection of data** for these purposes and will *de facto* **prevent the sharing of information** with our analytics and/or advertising partners.

Access right

Upon request, HypeMobia will provide you with information about whether we hold any of your personal information. You may access or request deletion of your personal information directly in HypeMobia mobile apps or by contacting HypeMobia Data Protection Officer as indicated in the “Contact” section below. We will respond to your request within a reasonable timeframe.

Rectification and erasure

You may request HypeMobia the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data. You may also request HypeMobia to erase without undue delay your personal data when it is no longer necessary for HypeMobia to retain such data.

In order for your data to be erased or rendered inaccessible you can either:

- reset your mobile advertising identifier (IDFA on iOS, GAAID on Android) or activate “Limit Ad Tracking” in your device’ settings in order to make previously collected data non linkable to you or your device anymore and limit further data collection if you choose to enable the “Limit Ad Tracking” option
- contact HypeMobia Data Protection Officer, as indicated in the “Contact” section below in order to have the data previously collected by HypeMobia on you and/or your device permanently erased or anonymized

Portability

Upon request, HypeMobia will provide you with the personal data that you provided to us and, if possible, will communicate this information directly to another data controller of your choice in a portable format when the processing is based on consent or contract.

Right to lodge a complaint

You may lodge a complaint with a Data Protection Authority. Under Law ¹ 2297-VI specifically authorized state agency on protection of personal data of individuals is the State Service of Ukraine on Protection of Personal Data.

Contact

hypemobia.games@gmail.com

Data Protection Officer – HypeMobia – 02005 Ukraine, Kyiv, street Panel, building 4.