

Privacy Policy of Services by Roberto D'Autilia

Welcome to the **Roberto D'Autilia** software Privacy Policy, which describes how **Roberto D'Autilia** as a data handler collects, uses, processes, and shares information about the user in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and Council of April 27, 2016).

This policy applies to the following software:

Sverso una Architettura, available on **iOS** devices;

Sverso una Architettura, available on **Android** devices;

the web app available at <https://sverso.herokuapp.com>.

In this Privacy Policy we refer to our games, websites, marketing and advertising activities and other services collectively as our "Services".

By downloading, accessing and/or playing our games, or interacting with our websites or other Services, you agree to the use of your information in accordance with this Privacy Policy. If you have any concerns about providing information to us or it being used as described in this Privacy Policy you should not use our games or other Services.

This Privacy Policy was last updated on 21.05.2018.

(ITA)

*Benvenuti e benvenute nella Privacy Policy del software **Roberto D'Autilia**, che descrive come **Roberto D'Autilia** come gestore dei dati colleziona, usa, processa e condivide informazioni sugli utenti in accordo con la General Data Protection Regulation (Regulation (EU) 2016/679 dell'European Parliament and Council del 27, 2016).*

Questa policy si applica al software seguente:

Sverso una Architettura, applicazione per dispositivi **iOS**;

Sverso una Architettura, applicazione per dispositivi **Android**;

applicazione web disponibile sul sito <https://sverso.herokuapp.com>.

In questa policy ci riferiamo ai nostri giochi, siti web, alle attività di marketing e pubblicità e ad altri servizi nel loro complesso come i nostri Servizi ("Services").

Scaricando, usando, accedendo o giocando ai nostri giochi e interagendo con i nostri siti web e altri Servizi, date il consenso all'uso delle vostre informazioni in accordo con questa Privacy Policy. In caso di By downloading, accessing and/or playing our games, or interacting with our websites or other Services, you agree to the use of your information in accordance with this Privacy Policy. Nel caso non siate d'accordo con le modalità descritte in questa Privacy Policy con cui le vostre informazioni sono fornite a noi o con cui le informazioni sono usate, non dovrete utilizzare i nostri giochi e i nostri Servizi.

Playing our games

Information about the user is collected when he or she plays our games or uses our other Services. Most of this data comes directly from the user, such as device information, country and region, and game play information. We use this data to provide our games and Services to you, including for the purposes of optimization, preventing fraud, customizing in-game offers and verifying purchases. We may also use it for the other purposes set out in this Privacy Policy, including for Marketing and Advertising purposes.

Most of the information that we collect about the user comes directly from him or her when he or she plays our games, interacts with our websites, advertising or other Services. Broadly the information we collect about the user relates to the type of device he or she is using, how he or she plays our games (such as levels attempted and purchases made) and may include information that he or she submits when he or she connects to his or her social network accounts through our games or Services. We may also collect information from advertising platforms and partners and other third parties such as information about purchases and interests.

In more detail, depending on which of our Services you (as the user) interact with, we may collect and process the following types of information:

details on the use and interaction of our games, advertising and other Services (for example, information about how and when you play our games or visit our website(s), what device you use to access our game and on the use of our games on social networks;

information provided by the user when he or she fills in forms, answers questions or completes surveys when using any of our Services, or if he or she invites his or her friends to use our games and Services;
the content of messages sent via our messaging systems (e.g. Mail channels, instant messaging);
the user interactions on our social media channels;
information we collect via cookies and other similar technologies;
information as further set out in this Privacy Policy, including Marketing, and Advertising;
information we collect about you from other third party companies who have obtained your consent or have another legal right to share such information with us (including publishing partners, platforms, advertising platforms and partners and data aggregators who have obtained). This may include attributes about you and your interests, as well as other games and services you use, demographic and general location information. We will use this information as described in this Privacy Policy and subject to any limitations in the privacy policy of the company that collected the information from you.

The information that we collect when you use our Services will be anonymous, but we will collect device level identifiers and other information associated with those identifiers including:

the type of device(s) you are using to play our games or access our Services, identifiers such as IP address, device identifiers, ad identifiers, and the country or region that you are playing in;
how you play our games and interact with our websites or other Services (such as which of our games you are playing, your progress through the games, session time and duration, number of attempts at each level and purchases made).

In some instances, when you make purchases on or through our website(s), we may collect certain payment information from you on behalf of our payment service providers, but this information is temporarily cached in a way that is unreadable by **Roberto D'Autilia**. We do not collect or retain credit card information. Our payment service providers will provide us with information about your purchases so that we know if a purchase has been successful.

When you purchase items via our mobile apps (such as those you can purchase in the App Store, on Facebook or on Google Play) we do not collect or store any payment information from you.

Occasionally we may ask you for your consent to collect other information from you or your device. In this or a similar circumstance, we will tell you what information we would like to collect, why we need it, and what we'll use it for.

We, our suppliers and group companies, may use this information:

to enable us to provide our games and other Services to you, to ensure that any purchases you make are verified on our servers and activated in the games, and to provide the user with support if he or she needs it;
to enable us to optimize our games for you and for the device that you are using, as well as to deliver customized in game events, offers and promotions;

For the other purposes as set out in this Privacy Policy, including for Marketing and Advertising purposes; and
to enable us to comply with laws that apply to us, to prevent fraud, to ensure compliance with our terms of service or where necessary to defend, exercise or establish our legal rights.

We may also share your information with third party publishers who develop and provide games and other Services to you on our behalf.

We also analyze and use the information that we collect on an anonymized or aggregated basis for new product development, to analyze the performance of our games, to troubleshoot and to improve and optimize the games to ensure the best player experience for our players as a whole.

A more detailed description of some of the ways that we use your information is set out below and in the other sections of this Privacy Policy.

1.1 Providing and optimizing our Services

We use your information to enable us to provide our websites, advertising, and other Services to the user, and to optimize all of them so that we can make them the best they can be for all of our users. This will include use and analysis of aggregated data to make sure that our websites work properly on all devices and are as enjoyable as they can be for all our players.

1.2 Customer Services

We use your information, including data that you provide directly to us in communications, to provide you with support through our customer service channels when you need it. We may also use it to contact you, for example as part of customer service or to send you updates about our games and Services. Finally, we will use your data to manage your relationship with us and improve your experience when you use our Services.

1.3 Analytics and Research

We use analytics tools, which may include third party analytics tools, to collect information about how you play our games or use our Services. Those tools may use cookies or other similar tracking technologies. We may use your data to carry out research, surveys or to engage directly with you, for example by sending you communications (including by email), for these purposes. We may also create reports, analysis or similar services for use by us for the purposes of research or business intelligence, for example to track potential problems or trends with our Services, or to test out new game features and content.

1.4 Social and Community

We have a number of social and community channels which we use to communicate with our users and players. If you choose to interact with those channels, we will receive your information and use it in connection with those channels, including to engage with you, and we may also republish your posts to those channels.

1.5 Promotions and Competitions

From time to time we may run promotions or competitions during which we may collect certain personal information from you, such as your name, address, post code, email address or other information or content submitted in order for you to claim a prize. Those competitions will have their own specific terms and conditions, but we will use personal information that you provide in relation to that competition for the purposes of running the competition. We may also publish the names and entries of competition entrants. That information will be processed, stored and shared in accordance with this Privacy Policy.

Visiting our websites

When you visit our websites, such as <https://sverso.herokuapp.com> and other websites and forums operated by us ("Websites"), we collect information about you, such as details about how you use and interact with such Websites. We may use the information we collect about you for a number of purposes, including for operating and optimizing the Websites, in connection with our advertising purposes, and for research or analysis.

The information we collect and process about you when you visit our Websites includes:

information that you provide us with when you fill in forms or create posts on our Websites;

details of your use of the Websites and the resources that you access (for example, information about how and when you use the Websites, or what device you use to access the Websites);

if you contact us or respond to messages and communications that we or other users of the Websites send to you, we may keep a record of that correspondence;

your interactions with us on our social media channels;

information we collect via cookies (which are small text files placed on your device). Cookies allow us to collect data, such as your device's model, operating system and screen size and other information about how you use our Services.

We, our suppliers and group companies, may use this information:

as necessary in order to provide the Websites and related services to you;

for the purposes of contacting you, for example as part of customer service or to send you updates about the Websites;

for the purposes of managing your relationship with us and improving your experience when you use the Websites;

for the purposes of research, surveying, and engaging with you, for example by sending you communications (including by email) for these purposes;

for the purposes of marketing and promotion of **Roberto D'Autilia** software products, for example sending you communications (including by email) for these purposes on our, or a third party's behalf. For example, we might send you information about merchandise relating to our games. If you do not want us to use your data in this way please let us know by contacting us at ufficio.uao@gmail.com;

to create reports, analysis or similar services for use by us for the purposes of research or business intelligence, for example to track potential problems or trends with the Websites;

for the purposes of preventing cheating, crime or fraud. We may also need to pass your information to fraud prevention agencies and other organizations involved in crime and fraud prevention; or

as otherwise expressly set out in this Privacy Policy or as required by law.

Marketing

We use information we collect about you to send you marketing communications about other **Roberto D'Autilia** games and related Services based on your interests. For example, we may send emails, serve ads within our Services or place ads on third party websites, apps and internet-connected devices. This section also explains how you can opt out of this.

We may use the information we maintain about you to promote **Roberto D'Autilia** games services in a variety of ways. This could include:

- advertising within third party websites, apps and Internet-connect devices;
- showing you promotions for other **Roberto D'Autilia** games in the games you play; or
- sending you marketing materials by email.

3.1 What information do we use for marketing?

We use information about you to try to make sure you only see marketing from us that might be of interest to you. This includes using information that we may have about you, such as:

- ad identifiers and other non-personal information collected from your device. For more information, see Ad identifiers and similar technologies;

- the games you play and information about how you interact with our games and Services;

- your age, country or region, and gender; and

- other information that we might acquire from third parties who have obtained your consent or have another legal right to share that information with us.

3.2 Marketing partners

When we market our games in media published by other companies, we use various third party marketing partners to assist us on our behalf.

Our marketing partners help us to serve ads to you by using data which they have collected about you. They collect this information when you use their services or the websites and services of third parties. Our partners use this information to make assumptions about the kinds of advertising you would prefer to see. If they determine that you would be interested to see an advert for **Roberto D'Autilia** games or Services, they will serve you with a **Roberto D'Autilia** ad.

This Privacy Policy does not apply to the collection of your information by our marketing partners. Although we are not responsible for the data collection or data use of our marketing partners, we require our marketing partners to have a legal basis for their use of your data for marketing purposes and to provide you with details on how you may opt-out from data collection by them. We recommend that you review our partners' privacy policies for more information (a full list of our marketing partners and their Privacy Policies can be found [here](#)).

You can disable interest-based advertising by **Roberto D'Autilia** or any other company by following the steps at [How to adjust your preferences for interest based advertising](#).

3.3 Opting-out of direct marketing from Roberto D'Autilia

You can exercise choices over the direct marketing we send you in the following ways:

- simply click the unsubscribe link in any direct marketing email we send to you or send an email to ufficio.uao@gmail.com to stop receiving commercial emails from us; and

- please see "How to adjust your preferences for interest based advertising" below to deactivate advertisement based on your interests.

You should note that if you opt out of receiving interest based or targeted advertising, you will still see advertising and you may see advertising for **Roberto D'Autilia** products, but that advertising will not be targeted using your personal information.

Advertising

Our games or Services may include advertising for third party products and services. Unless you opt out of interest-based advertising, we and our advertising partners will use information about you to improve advertising, targeting and measurement systems so that we can show you relevant third party ads in our games.

We use information that we hold about you to better target ads for third party goods and services to people that might be most interested in them. These ads may be shown to you within our games or Services.

4.1 What information is used for advertising?

We use ad identifiers and other information that we collect about you as described in this Privacy Policy to try to make sure you only see ads in our games that might be of interest to you. This includes information such as:

- ad identifiers and other information collected from your device. For more information, see ad identifiers and

- similar technologies; the games you play and information about how you interact with our games and Services;

your age, country and region, and gender; and other demographic and interests based information that we might acquire from third parties who have obtained your consent or have another legal right to share that information with us.

4.2 Advertising partners

When you play our games or use our Services, non-personal identifiers and other information from your device is collected and shared with advertising partners to enable the technical delivery of ads to your device.

Our advertising partners may combine this information with information which they have collected about you when you use their services (or the websites or services of third parties) in order to serve you more relevant ads in our games or to improve the accuracy of their targeting and measurement systems.

This Privacy Policy does not apply to the collection of your information by our advertising partners. We recommend that you review our advertising partners' privacy policies for more information (a full list of our advertising partners and their Privacy Policies can be found [here](#)).

4.3 Opting-out of interest-based advertising

You can choose to prevent your device's ad identifier being used for interest-based advertising by updating the settings on your device. For more information, see [How to adjust your preferences for interest based advertising below](#).

Please note that if you opt out of interest based advertising, you may still see advertising in our games but those ads will not be targeted using information that we hold about you. However, they may still be delivered based on contextual criteria such as the game that ad is to be displayed in, or the region in which your device is located.

Ad identifiers and similar technologies

To provide our games and interest-based advertising, we use ad identifiers and similar technologies. This section describes our use of these technologies and how you can manage your preferences.

Ad identifiers and similar technologies are used by us to provide our Services to you and in order to collect data from your device. These technologies allow us and our third party advertising partners to:

- recognize you and your device;

- provide interest-based advertising to you;

- allow our Services to interact with a third party social network or platform (where you have chosen to allow such interaction);

- allow our payment processors to process your payment instructions; and

- enable us and third parties to provide you with more customized services, for example to provide our Services in the correct language.

5.1 How do ad identifiers and similar technologies work?

Ad identifiers are non-permanent, non-personal identifiers such as the Android advertising ID and/or Apple's ID for advertising (the 'IDFA'), which are uniquely associated with your device. Similar technologies include tracking pixels within ads. These technologies allow companies (including marketers and advertisers) to recognize your device when you use websites and applications.

5.2 How to adjust your preferences for interest-based advertising

You can choose to prevent your device's ad identifier being used for interest-based advertising, or you can reset your device's ad identifier, by changing the settings of your device. Settings vary from device to device but you will usually find the ad identifier settings under "privacy" or "ads" in your device's settings.

If you live in the USA, Europe or Canada, you can also opt-out from the collection of your information by some or all of our advertising partners who participate in the Digital Advertising Alliance by visiting <http://www.aboutads.info/choices/> (for US users), <http://www.youonlinechoices.com/> (for European users) or <http://youradchoices.ca/choices> (for Canadian users). You can also click on the AdChoices logo within an advertisement (where available).

If you choose to adjust your preferences in order to prevent these technologies, you may find that you cannot enjoy the full use of our Services.

Notice: adjusting your preferences as described in this section does not mean you will no longer receive adverts, it only means the adverts you do see will be less relevant to your interests.

Your rights

You have certain rights in connection with your personal information and how we handle it. You can exercise these rights at any time by contacting us via any of the methods set out in the [Contact Us](#) section below.

Those rights include:

Right of access.

You have a right to know what information we hold about you and in some cases to have the information communicated to you. If you wish to exercise this right please contact us letting us know that you wish to exercise your right of access and what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for, for instance if the information includes personal information about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to tell you why. We will try to respond to any request for a right of access as soon as possible, but we will always do so within 1 month of receipt of your request and verification of your identity.

Right to correct personal information.

We try to keep the information that we hold about you accurate and up to date. Should you realize that any of the information that we hold about you is incorrect, please let us know at ufficio.uao@gmail.com and we will correct it as soon as we can.

Data deletion.

In some circumstances you have a right to have some of the personal information that we hold about you deleted. Should you wish to have any information about you deleted, please Contact Us using the information below. Please note that in order to process your request you must delete our games from your mobile devices and clear our cookies from any device where you have played our games in a web browser. Where we delete personal information about you, we may still retain some or all of that information for other purposes such as maintaining financial records, protecting or enforcing legal rights, maintaining marketing suppression lists or for technical reasons such as maintaining technical security or our database integrity. We may also retain your information in an anonymized form. In some instances, personal information about you that is visible through gameplay such as username, avatar, and your high scores may be cached on other players' devices and we may not be able to remove or update that data from those devices, for example if that device is not connected to a Wi-Fi network.

Data portability.

In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller.

Restriction of processing.

In some cases, you may have the right to request a restriction of the processing of your personal data, such as when you are disputing the accuracy of your data held by us.

Right to object.

You have the right to object to the processing of personal data about you which is processed on the grounds of legitimate interests (see Legal Bases below).

Direct marketing opt out.

If you have elected to receive direct marketing communications from us, you can change your mind at any time by following the opt out link in any marketing communication that is sent to you. If you have elected to receive more than one type of marketing communications from us, you may need to opt out of all of them individually. It may take a few days for us to update our records before any opt out is effective.

There are other ways in which you can control the personal information that we collect about you. For instance, you could delete our games and apps from your mobile device. You could also reset your mobile advertising identifier or limit ad tracking altogether using the settings in your phone. Finally, you could limit or prevent the use of cookies in your web browsers. More information on all of these options is provided elsewhere in this Privacy Policy.

General

Our Privacy Policy contains further details including:

who we share your information with and the reasons for sharing it;

measures we take to keep your information secure;

the legal bases under which we process your data;

how long we retain your information and where we store it;

when and why we share your information with third parties, including transfers outside of the European Economic Area (the "EEA"); and

changes or updates to our Privacy Policy.

7.1 Sharing

In addition to the other disclosures described in this Privacy Policy, we will also share your information:

where we have your consent to do so (including as set out in this Privacy Policy);

as reasonably necessary in order to provide the Services to you (for example, by providing your personal information to suppliers we may use to fulfil the Services or to communicate with you);

where it is necessary to carry out your instructions (for example, to process a payment instruction we must provide your personal information to our payment processors);

where your data is in an anonymous and aggregated format, meaning you could not be personally identified from it;

as we reasonably believe is permitted by law or regulation or as is necessary to comply with any legal obligation, or in order to enforce or apply our terms and conditions and/or any other agreement with you; or to protect the rights, property, or safety of **Roberto D'Autilia**, our users, or others; and

if there is a sale of the assets of **Roberto D'Autilia** or corporate restructuring, or as a result of a change of control of **Roberto D'Autilia** or one of its group companies, or in preparation of any of these events. Any third party to which **Roberto D'Autilia** transfers or sells **Roberto D'Autilia**'s assets will have the right to continue to use the personal and other information that you provide to us in the manner set out in this Privacy Policy.

We may also share your information with our service providers if necessary to enable them to provide services to us.

7.2 Security

Roberto D'Autilia takes appropriate security and technical measures to protect your information from unauthorized access, loss, and misuse. In addition, we request that our suppliers who process personal information on our behalf take a range of security measures designed to help protect your personal information and maintain an appropriate level of security. However, we cannot guarantee the absolute security of your information online and offline, as the Internet by its nature is not a secure environment and the nature of security risks is constantly evolving. As such you should always take care when sharing your information online.

7.3 Legal Bases

In each case where we process your information, we do so lawfully in accordance with one of the legal basis set out under European data protection law. The legal bases which we rely upon are the following:

Contractual Necessity.

This covers data used by us in order to provide you with Services that you have requested – and that we have agreed – to provide to you, such as our games, customer services, chat functionality and third party social network connectivity;

Legal Obligation.

This covers data used by us to comply with a legal obligation, such as the prevention of crime or fraud or to maintain records relating to tax;

Legitimate Interests.

This covers data used by us for purposes that are not harmful to your privacy and can be reasonably expected within the context of your use of our Services, such as Marketing, Advertising, analytics and research and optimization of our games and other Services; and

Where we ask for your consent to use your data for a particular purpose, we will make this clear at the point of collection and we will also make clear how you can withdraw your consent.

In this Privacy Policy we have explained how you can opt out of certain types of processing that we undertake and where any processing is based on your consent, you can withdraw that consent at any time. Nonetheless, if you play our games we will still collect some personal data about you and process it as otherwise described in this Privacy Policy. If you do not wish us to collect any personal data about you at all, you should cease playing our games and stop using our Services.

7.4 Data Retention

We will keep your information for as long as we consider necessary for the purposes described in our Privacy Policy. We will also retain and use your information for as long as is required in order to comply with our legal obligations.

7.5 Location of storage

We store your information on servers that we control which are primarily based in the EEA. We may also use servers and engage providers that are located outside the EEA in order to process and store your information and to provide services to us.

7.6 International Transfer

We may transfer your information to affiliated entities or third parties to jurisdictions outside the EEA. Please note that these countries outside of the EEA may not have the same data protection laws as your own jurisdiction. We take steps to ensure that there are adequate safeguards and mechanisms in place (including the use of EU model clauses) to allow the transfer of your information across borders outside of the EEA.

7.7 Changes to this Privacy Policy

We may update this Privacy Policy from time to time and we will post the updated Privacy Policy on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new policy will be effective from the date it is published by us.

Contact us

If you have any questions or concerns about any of the matters in relation to this Privacy Policy, including to exercise any of your rights, you can contact us:

By email to: ufficio.uao@gmail.com