

Privacy policy

If you are a minor, and are not sure to understand everything in this Policy, please make sure to speak with a trusted adult before using SPARKS Apps and Games. Please also remember that SPARKS Apps and Games are not meant to be used if you are under 16.

Introduction

SPARKS INFORMATION (SINGAPORE) PTE. LTD. (hereinafter referred to as "SPARKS") is an international entertainment company specialized in the publishing of mobile games by the latest high-tech and infinite potential creativity, which aim to entertain, educate and satisfy our customers.

Purpose

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 SPARKS when you use one of our applications or browse on our website. This privacy policy governs and details the main principles that SPARKS applies to the data we collect and process to:

- (i) develop, publish and monetize mobile games and applications ("SPARKS Apps and Games").
- (ii) run our corporate website ("<https://www.huntingsniper.games>").

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 SPARKS Data Protection Officer as indicated in the contact section of this policy.

SPARKS Apps and Games

Why does SPARKS collect data from its apps and games?

When you use the SPARKS Apps and Games, We will collect information about you. Such information, also known as "personal data" can be automatically collected by SPARKS when necessary, or voluntarily submitted by you. We use this data to provide you with the app or game that you downloaded, to ensure safety, and for other purposes described below (for instance advertising).

When you install and use SPARKS Apps and Games, we can collect and process some of your data for different legitimate purposes.

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

SPARKS 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 – SPARKS's legitimate interest : 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, SPARKS only shares personal data collected through SPARKS apps with third party partners that provide SPARKS 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. SPARKS collects user data for the purpose of its own internal analytics tools. Data is used for the sole purpose of SPARKS analytics tool and is not shared with any third parties. This data processing is based on the legitimate interest of SPARKS.

- To serve advertising tailored to the preference and interests of our users and allow SPARKS 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, SPARKS only processes or shares personal data collected through SPARKS apps for personalized advertising purposes once you express your consent through the pop-up notice included in one of our apps.

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 SPARKS collect from its apps and games?

SPARKS does not use any data that allows us to identify you directly. We only collect mobile identifiers and other technical information (if necessary, only with your consent) allowing us to recognize your device.

For all the purposes listed above the data that SPARKS 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)

In some of SPARKS Apps and Games, you may choose to login to your account with a third party service (Google or Apple) to improve your experience (sync your progress in multiple devices, secure your progress and restore it in case of device lost, device upgrade, etc.). In such case, we may collect and securely store your email address (and no other account data) in a hashed format within our database. This information will be used by SPARKS for account recovery and customer support purposes only. We will not share your email with any third-party without your consent. With your consent, we may use your email address to keep you informed of the concerned App and Games updates and offers.

With whom may your data be shared & why?

We are not selling your personal information, but we need to share it with third parties to deliver the best service possible. Do not worry, we make sure that they all use the same degree of care as We do.

SPARKS 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:

- Adcolony - <https://www.adcolony.com/privacy-policy/>
- Applovin - <https://www.applovin.com/privacy/>
- Facebook - <https://www.facebook.com/about/privacy>
- Fyber - <https://www.fyber.com/privacy-policy/>
- Google - <https://policies.google.com/privacy>
- Inmobi - <https://www.inmobi.com/privacy-policy/>

- Ironsource - <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
- Mintegral - <https://www.mintegral.com/en/privacy/>
- Mopub - <https://www.mopub.com/legal/privacy/>
- Oath - <https://policies.oath.com/in/en/oath/privacy/>
- Ogury - <https://ogury.com/privacy-policy/>
- Tapjoy - <https://www.tapjoy.com/legal/tapjoy-users/#privacy-policy>
- Vungle - <https://vungle.com/privacy/>

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:

- AppsFlyer - <https://www.appsflyer.com/privacy-policy>
- Adjust - <https://www.adjust.com/terms/privacy-policy/>
- Google Analytics - <https://policies.google.com/privacy>

Authorities: only to the extent we are obliged to by applicable laws and regulations.

SPARKS Website

SPARKS Website is mainly informative, and its use is governed by the Terms and Conditions available [here](#).

Why does SPARKS collect data from its website?

Like on most websites, when you browse on SPARKS(<https://www.huntingsniper.games>) certain information about your connection and device(s) are automatically collected for the website to operate properly.

SPARKS and its partners also use cookies and similar technologies to analyze how our users interact with our services and administer the website. Cookies are small text files stored on your browser that allow the collection of non-personally identifiable information related to your navigation on a website.

You can control the use of cookies in your browser settings but if you choose to disable cookies it may affect certain websites' functionalities.

What data does SPARKS collect from its website?

For the purposes listed above the data that SPARKS and its partners collect is limited to:

- Browsing events and interactions with the website's contents and services
- Anonymized IP address and technical information related to your browser and/or device (user agent)
- Information you provide us with voluntarily when you contact SPARKS

Analytics and third party cookies

SPARKS uses Google Analytics to collect information related to the web traffic on our website. This service allows us to measure the performance and proper functioning of our website and to provide you with a better experience. SPARKS made sure to configure this tool in such a way that the information collected for this purpose is anonymized in a way that does not allow to identify any end users of our website.

For more information on the data protection and privacy aspects of these analytics services, you can refer to Google specific policy accessible here: <https://policies.google.com/privacy> and opt-out from Google Analytics data collection here: <https://tools.google.com/dlpage/gaoptout>

Social networks and other communication tools

Our website also offers communication tools allowing users to share content on social networks. When you interact with such social media widgets or “share buttons”, these social network companies may collect information about you and/or your device and connection. your interactions with these services are governed by the respective privacy policies of the companies providing these services. For more information on the data protection and privacy practices of these companies, you can refer to their specific policies listed below:

- **Facebook:** <https://www.facebook.com/about/privacy>
- **Linkedin:** <https://www.linkedin.com/legal/privacy-policy>

Security and other important information

How long does SPARKS keep your data?

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

SPARKS 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

SPARKS never knowingly or willingly collects any personal data concerning children under 16 years of age. If you are under 16, please do not use SPARKS Apps and Games.

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?

Your personal information belongs to you, and we will make sure your rights are respected. You can contact Us at dpo@huntingsniper.games at any time to ask for a copy of your data, to withdraw your consent, or to obtain the deletion of the information we keep for you.

Consent withdrawal and opt-out of sale of information

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

Please note that if SPARKS 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 SPARKS 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, SPARKS 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 SPARKS mobile apps or by contacting SPARKS 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 SPARKS the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data. You may also request SPARKS to erase without undue delay your personal data when it is no longer necessary for SPARKS 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 SPARKS Data Protection Officer, as indicated in the “Contact” section below in order to have the data previously collected by SPARKS on you and/or your device permanently erased or anonymized

Portability

Upon request, SPARKS 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. SPARKS being a Singapore company, our supervisory authority is in Singapore : PDPC

<https://eservice.pdpc.gov.sg/case/db>

Delete Account Data

In addition to contacting our email address, you can also follow the instructions on our data deletion website <https://www.huntingsniper.games/account-delete.html> to delete your account data.

Contact

SPARKS SAS is the Data Controller

You can contact our DPO at:

- dpo@huntingsniper.games
- 18 Kaki Bukit Road 3, #05-18, Entrepreneur Business Centre, Singapore