

HOLD'EM ALL PRIVACY POLICY

1. GENERAL INFORMATION

DATA CONTROLLER:

HUN YAZILIM VE REKLAMCILIK LTD. ŞTİ.

E-mail Address : privacy@hungames.com

Address : Balcalı Mahallesi Güney Kampüs Bulvarı, Teknokent Sitesi B blok Kat:2
Daire: 209 Sarıçam/ ADANA

This privacy and data policy ("**Privacy Policy**") applies and has effect in respect of all games, related online services (*including online network play connectivity and interactivity*) and other software and products made available by Hun Games. Together the mobile app/Game(s) and the Website are referred to as the "**Online Services**".

As Hun Games, we are committed to protecting and respecting your privacy. The Privacy Policy explains the basis on which personal information we collect from you will be processed by us or on our behalf. Where we decide the purpose or means for which personal data you supply through these Online Services is processed, we are the "controller".

The Online Services may contain hyperlinks to services owned and operated by third parties. These third-party services may have their own privacy policies and we recommend that you review them. They will govern the use of any personal information that you submit or which is collected by cookies and other tracking technologies whilst using these services. We do not accept any responsibility or liability for the privacy practices of such third-party services and your use of these is at your own risk.

Hun Games reserves the right to modify this Privacy Policy and your continued use of the Services shall mean your acceptance of the changes to this Privacy Policy You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes through the Online Services.

Hun Games understands the importance of your privacy and committed to protecting the privacy of everyone who uses our websites and applications. We would like to let you know that Hun Games websites and applications can be used all over the world. Because of that, the privacy and data protection regulations and requirements vary according to the country. We are believe and try to provide the same high level of protection which is described in this privacy policy. Through this privacy policy we are hoping to explain to you about how your data is being used. If we seek to use your information for other purposes other than those specified in this policy we will ask for your informed consent.

Please note that you are expected to carefully read the contents of this Privacy Policy and confirm your full understanding before using Hun Games's products or services. We also want to let you know that Hun Games attaches immense importance to the protection of the personal information of minors. **If you are a minor under the age of 18, your guardian must read the Privacy Policy ("*the current policy*") and the Hold'Em All Children's Privacy Guide carefully and agree or authorize you to**

agree to use Hun Games's products or services in accordance with the the current policy. If you have additional questions please contact us at support@hungames.com

2. HOW WE OBTAIN YOUR DATA

2.1. The Data Processed When You Enter The Game (Provided By You)

All features on the Hun Games Game(s) are available without the need for registration by you. We don't work with accounts or chat box functions. No personal data (such as email addresses and phone numbers) is requested from you. Nonetheless, Hun Games does process certain electronic data when you play the Hun Games Game(s) for specific purposes, as detailed below.

Hun Games collects your data during your use of it's game services. The data Hun Games will obtain will be; number of sessions and durations, session duration, operating systems, device models, geography (country info), first launches, app opens, app updates and in app purchases. Even if these data are matched separately or with each other, they do not identify or make your identity identifiable.

2.2. Derived

Certain data we do not receive directly, but can be derived from the information already in our possession. For example, information about your language preferences.

If the provision of certain personal data is a legal or contractual obligation or an essential requirement for concluding an agreement with us, we will separately provide additional information about this for as far as this is not clear in advance. In such case we will also inform you about the possible consequences if this information is not provided.

Hun Games reserves the right to collect your information or get your authorization when you need to use specific functions or game services.

When you play the game, the following data may will processed by us:

Service/Function	Scenario triggering	Information type	Description
Device Information	User's first use	Device Type, Phone Model, Operating System Language	Important identifier of the account, to ensure the security of the account, and to ensure that the user logs in to the device the same as the last time, retain the user's game progress, and ensure that the user can completely run the game on a specific device

In-game Purchases	The user has purchased products in-game	List of purchased products	
Advertising	The user watches advertisement in the game	Useractivity data (how many ads viewed, date, operating system information, ad revenue, total ad revenue generated from the user, ad type (interstitial, banner))	These data do not constitute personal data because no information on the identity of the person can be obtained by using these data directly or by matching them with other data. This data is transmitted to the adpublisher organization.

2.3. Hun Games can obtain your relevant information without your permission according to laws and regulations if such information:

- 2.3.1. Is related to national security and national defense security.
- 2.3.2. Is related to public security, public health, and major public interests.
- 2.3.3. Is related to criminal investigation, prosecution, trial, and execution of judgment.
- 2.3.4. Is related to other cases specified by laws and regulations

3. HOW HUN GAMES USES YOUR PERSONAL INFORMATION

Although Hun Games does not process personal data, when you contact to us via e-mail, we will processes your information for the following purposes:

- For the functioning of the Hun Games Game(s) (such as; remembering your settings and to save the game progress.)
- For handling any requests, complaints and disputes, for example when you contact us;
- For determining, exercising and defending our rights; and
- For complying with legal obligations (incl. fraud prevention) and requests of authorized governmental institutions.

We base the use of your data in the context of the Hun Games Game(s) on our legitimate interest in offering and securing our game(s), and pursuing the other processing purposes listed above. If you need additional information you can contact to us directly by support@hungames.com We may also process your data based on a legal obligation. This means that we will process the data for as far as we are legally obliged to do so, for instance if we receive an injunction that we need to adhere to.

4. WHO DO WE SHARE YOUR DATA

Hun Games does not share or restore your personal data. You as the user understand and agree that in order to provide you with better game services and experience, we share and restore your “Game Data” and “Technical Data” in our partner (third-party service providers). We securely store game data and technical data by using Storage services provided by Amazon Web Services (“AWS”) and Google Cloud. You can find more information regarding AWS’s and Google’s websites.

5. SECURITY OF YOUR PERSONEL DATA

Protecting your privacy and data Security of your personal information is important to us. Therefore;

- Hun Games retains your personal information only for such period as is necessary for the purposes set forth in the Privacy Policy or during such time limit as may be required by laws and regulations.
- Hun Games has implemented appropriate technical and organizational measures to protect and secure your personal data, in order to prevent violations of the confidentiality, integrity and availability of the data. Please note that, the internet environment is not completely secure and Hun Games will do its best to ensure or guarantee the security of any information you send to Hun Games.
- In the event of an personal information security incident, Hun Games will, in accordance with the requirements of laws and regulations, promptly inform you of the basic status of the security incident and its possible impact and the measures Hun Games has taken or will take to handle the same, and provide suggestions to help you prevent and reduce the risk independently, as well as provide remedial measures.
- We securely store your information by using the Storage service provided by Amazon Web Services (referred to AWS) (<https://aws.amazon.com/>); Google Cloud (<https://cloud.google.com/privacy>) and Microsoft Azure (<https://privacy.microsoft.com/en-us/privacystatement>). You can find more information regarding Amazon Web Services’ Security, Identity, & Compliance at <https://docs.aws.amazon.com/>.

6. HOW TO CANCEL YOUR ACCOUNT

All features on the Hun Games Game(s) are available without the need for registration by you. If you uninstall/delete the Hun Games Game (s) form your mobile device, you will also delete all information in the game.

7. PROTECTION OF THE PERSONAL INFORMATION OF MINORS

Please review the details of the explanations regarding the processing of personal data of minors on [Hun Games Children’s Privacy Guide](#).

8. UPDATE OF THE PRIVACY POLICY

In case of any change in the products or services related to the Privacy Policy, Hun Games will get your consent again when you open the game.

9. MISCELLANEOUS

Unless otherwise specified, the Privacy Policy or the revised Privacy Policy shall take effect as of the date of promulgation. If you have any queries or suggestions related to Hun Games's products or services and the Privacy Policy, or if you want to complain about and report any issue when you think your personal privacy hasn't been protected, you can contact Hun Games via support@hungames.com Hun Games will reply within 30 working days; if you are not satisfied with Hun Games (s) reply, you can also complain or report to the relevant department.