

Rabona Games - PRIVACY POLICY

Last updated on January 1, 2023.

Rabona games ("**us**", "**our**", "**we**", "**Rabona games**") are committed to protecting and respecting your privacy.

This privacy policy (the "**Policy**") sets out the types of personal data we collect and use when you access and visit www.rabonagames.com or when you use one of our apps or games (each a "**Property**" and together the "**Properties**") and how we may use that data.

1. Introduction

This Policy covers our collection, processing and use of personal data when you use any of our Property.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Policy into several sections:

1. Introduction
2. What is personal data and what do we collect
3. How and why do we use/share your personal data
4. For how long do we keep your personal data
5. Security
6. Your Rights
7. Contact Details

It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Properties at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you first download and begin using a Property, or that may be displayed where you are given the opportunity to sign up to receive email updates from us) so that you are fully aware of how and why we are using that data.

This Policy supplements our Terms of Service, Cookie Policy and other notices and terms that appear in the Properties (which may vary from Property to Property) and is not intended to override or replace them.

By visiting or otherwise using our Properties, you are agreeing to the practices set out in this Policy to the extent permitted by data protection legislations. If, for any reason, you do not agree to the terms of this Policy, please stop using the Properties.

We reserve the right to revise or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let users of the relevant Properties know. However, it is your responsibility to check this Policy before each use of the Properties for ease of reference the top of this Policy indicates the date on which it was last updated.

Please note that our Properties are not directed at children under the age of 13 (each a **"Child"** together **"Children"**) and we do not knowingly collect personal data about Children. If you believe we have collected personal data about your Child, you may contact us at rabonagames@gmail.com and request that we cease processing data about your Child.

2. What is Personal Data and what do we collect?

What is personal data?

Where this Policy refers to "personal data" it is referring to data about you from which you could be identified such as your name, your date of birth, your contact details and even your IP address.

By law all organizations in the UK and Turkey are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organizations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the Your Rights section of this Policy.

Data we collect from you when you use the Property

Voluntary Provision of Data

When you voluntarily supply your personal data to us, for example where you; use the Property to upload or send personal data (by filling out a form on our website, entering your details into a profile page on one of our game Properties, contacting our customer support team, subscribing to one of our publications or newsletters, or similar activities in which you volunteer data about yourself); contact us by post, telephone, email or SMS; report a problem with a Property; we may collect, store and use the personal data that you disclose to us.

The personal data we collect from you may include your title, name, address, email address, phone number, financial and/or credit card information but will depend on precisely what details you volunteer to us as you interact with the Properties.

Automated Collection of Data

We may also collect personal data about you when you visit a Property (in particular the Rabona games website) through the use of technologies such as cookies. The following are examples of data we may collect:

- information about your device, browser or operating system (including unique identifiers which identify that device, such as your "Identifier for Advertising" or "IDFA");
- your IP address and information about the network you are using to access our Properties;
- information about links that you click in Properties and pages you view on our Property
- length of visits to certain pages on the Properties;
- data about how you play our games such as your scores, progress and global ranking;
- data about purchases you make via our Properties (e.g. in-app microtransactions) including details of the purchases you have made and the value of those transactions;
- details about other users with whom you have connected via our apps (e.g. your Friend lists) and any communications you send/receive to such people;
- subjects you viewed or searched for;
- page response times;
- records of download errors and/or broken links;

- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from the page; and
- the full Uniform Resource Locators (URL) clickstream to, through and from our Property (including date and time).

We use the data described above for several different reasons. Firstly we use it to ensure that the Properties work properly and that you are able to receive the full benefit of them. Second, we use the data to monitor online traffic and audience participation across the Properties. The relevant data is processed due to the fact that it is mandatory for the legitimate interests of Rabona games, provided that this processing shall not violate the fundamental rights and freedoms of the users.

We also use the data described above to provide a range of services to you these include answering your support queries, giving you access to in-game functions such as records of high scores, enabling you to purchase items in-game, and letting you connect with and communicate with your friends across our Properties.

Our Properties may include various functionality which lets you connect to social media (such as Facebook) if you choose to use this functionality then we will collect various data from you in order to enable those connections and to enable us to keep accurate records of the connections that you have made.

Third Party Resources

Our Properties contain various features that serve advertisements to you. In order to make those advertisements as relevant as possible we use third party advertising networks, which collect and use details about you and your interests in order to target relevant advertisements to you (rather than showing all Property users the same material).

Where we use these services we will give you the opportunity to disable the collection and transmission of information about you to those networks. Any such refusal will not cause you to cease seeing adverts, but it will decrease the relevancy of the adverts which are shown to you.

For details of the advertising partners that we use, please see the section below which names our providers.

3. How and why do we use/share your personal data

Sharing your personal data

Depending on how and why you provide us with your personal data we may share it in the following ways:

- we may share your personal data with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 in particular, we may share your Personal Data with our Turkish group company, which deals with customer support requests where they arise;
- with selected third parties who we sub-contract to provide various services and/or aspects of the Property's functionality, such as where third party plugins provide functionality such as message boards or image hosting services (see Service Providers below); and
- with analytics and search engine providers that assist us in the improvement and optimisation of the Properties as described above.

We will not share your personal data with third parties in order for that third party to provide direct marketing communications to you, unless it relates to a specific activity which we are undertaking with a third party (e.g. a competition where a third party is providing the prize) and you have provided your consent for that use. Such activity may have its own terms and conditions relating to the way in which your personal data may be used, which you will be notified of at the relevant time.

We may also disclose your personal data to third parties in the following events:

- if Rabona games or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply our Property's terms of use or terms and conditions; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with

other companies and organisations for the purposes of fraud protection and credit risk reduction.

Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. The following is a list of our major service providers:

- AdMob (AdMob Google Inc.)
- Appnext (Appnext Ltd.)
- Facebook Audience Network (Facebook, Inc.)
- Unity Ads (Unity Technologies ApS)
- MobFox (MobFox Mobile Advertising GmbH)
- Facebook Analytics for Apps (Facebook, Inc.)
- Google Analytics for Firebase (Google Inc.)
- Google Analytics (Google Inc.)
- Crashlytics (Google Inc.)
- Facebook Authentication (Facebook, Inc.)

Links to third party sites

Where we provide links to third party websites that are not affiliated with Rabona games (for example. where you click or tap on adverts in a Property) such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to those Properties.

4. For how long do we keep your personal data?

We will hold your personal data on our systems only for as long as required to provide you with the services you have requested or to perform the purpose for which that data was collected.

Where you sign up to receive email marketing from us we will retain your email address on file should you ever "opt-out" of receiving emails from us.

We will retain your email address in this way in order to ensure that we continue to honour and respect that opt-out request.

In some circumstances you can ask us to delete your data: see "Your Rights" below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this data indefinitely without further notice to you.

5. Security

Rabona games takes the protection of your personal data very seriously. We use encryption (SSL) to protect your personal data when appropriate, and all the data provided to us is stored on secure servers once we receive it.

Rabona games may store your personal data on secure servers either on our premises or in secure third party data centres.

Please note that some of our service providers may be based outside of the European Economic Area (the "**EEA**"). These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

Rabona games may process, store or transfer your personal data in Turkey or abroad, in accordance with the the Law on Protection of Personal Data No. 6698 and the relevant legislation within the limits set forth in the Policy. Where we transfer your data to a service provider that is outside of Turkey we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. If you would like more information about how the mechanism via which your personal data is transferred, please contact rabonagames@gmail.com.

If we ever give you (or where you have chosen) a password which enables you to access certain parts of this Property, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6. Your Rights

As a data subject you have a number of rights in relation to your personal data in particular your requests under Article 11 of the Law on Protection of Personal Data No. 6698 regarding the rights of data subject. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a **"subject access request"**).

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "right to be forgotten").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by writing to us using the contact details set out and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you

should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

Rabona games may process your data on the basis of a legitimate interest in the following ways:

- To optimise the content of our Properties and improve their technical functioning;
- To evaluate the popularity of our Properties and the features included within them;
- To provide technical support to you where we detect a problem in the functioning of a Property;
- To monitor and prevent antisocial behaviour within our Properties;
- More generally for the purposes of administering our company and running our internal business.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us using the contact details set out and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which

of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

Your Right to stop receiving communications

Where we send you email marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the "unsubscribe" link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly you can unsubscribe by writing to us at rabonagames@gmail.com and telling us which communications you would like us to stop sending you.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

7. Contact Details

If you have any queries regarding this Policy, if you wish to exercise any of your rights set out above or if you think that the Policy has not been followed, please contact us at rabonagames@gmail.com