

FOURSEVENSEVEN

Your privacy is important to us, and we take our responsibility of caring for it seriously. We respect your privacy rights and are committed to protecting the personal information that is collected about you. This Privacy Policy describes what information FourSevenSeven collects and how we use, disclose transfer, and store it. If you do not want FourSevenSeven to collect, store, use or share your information in the ways described in this Privacy Policy, you may not be able to play our games or use our services.

FourSevenSeven, including its subsidiary companies ("FourSevenSeven"), collects, stores, and uses your information as a data controller in connection with, and in order to provide and develop, FourSevenSeven games, mobile applications, services and websites (together referred to as the "Services") in accordance with this privacy policy ("Privacy Policy").

All of our Services, whether used on mobile devices, PCs or other platforms, are governed by this Privacy Policy.

By using the Services, you hereby consent to this Privacy Policy.

This Privacy Policy is effective as of September 25, 2022 and was last modified on January 06, 2024.

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please see the "How to contact us" section below.

1 – How we collect your information

FourSevenSeven collects some information from you when you: (a) create an account, (b) play our games or use game-related services, (c) make a purchase within our Services, (d) create user-generated content, (e) watch advertisements within our Services, (f) sign up for a newsletter, (g) contact FourSevenSeven customer service and take part in technical-support sessions, (h) enter a contest or participate in a challenge held by FourSevenSeven, (i) chat with other users of the Services, (j) signal interest in participating in a playtest, (k) share or contribute to our social-media channels and other community websites, or (l) apply to a job.

2 – Information we collect

For a better experience, while using our Service, I may require you to provide us with certain personally identifiable information, including but not limited to ID, IP address. The information that I request will be retained on your device and is not collected by me in any way.

The app does use third-party services that may collect information used to identify you.

Link to the privacy policy of third-party service providers used by the app

- [Google Play Services](#)
- [AdMob](#)
- [Google Analytics for Firebase](#)
- [Appodeal](#)
- [Unity](#)
- [GameAnalytics](#)

3 – How we use your information

We primarily use the information to provide you with a better gaming experience, but we also use your information, both individually and combined, as follows:

To operate our business and to enhance your gaming experience, including to:

- provide you with the Services that are suitable to your age and compliant with the applicable laws of your country of residence
- provide gaming experiences that you may like and functionalities you have subscribed to
- track your use of the Services to help us learn more about your gaming activities and understand your preferences and tendencies, so that we can personalize your experience, provide you within-game offers and notifications that are tailored to you, and otherwise enhance your gaming experience
- facilitate sharing on social networks
- register your participation in a contest and contact you in case of prizes
- offer you the opportunity to take part in playtesting (game tests)
- protect against cheating, crime or fraud, or for other security reasons
- identify and fix bugs and service errors
- use it for administration, analytics, research, and optimization
- compile statistics
- comply with all regulatory and legal requirements, and answer any requests from Data Protection Authorities or any law-enforcement agency

To provide you with support, communicate with you and respond to any requests or questions you have submitted through our customer support.

To personalize our communication with you, including to:

- handle your subscription to, and opting-out of, our newsletters
- contact you to promote our Services and contests we may offer
- send you, with your prior consent, promotions or marketing materials (we will provide you with the opportunity to opt out of receiving such materials in the future)
- provide you with advertising that better suits your interests and profile and is age-/gender-appropriate and targeted to your general location
- serve and measure the effectiveness of advertising
- collect any personal information you may disclose through messages you choose to send to another user or defined group of users through our message, chat, post or other in-game function, as well as to collect necessary personal information of the user(s) you are contacting, in order to facilitate the communication (Note: We will never collect any information sent outside of the functionality of our Services, including through emails or text messages)
- personalize your content and offers
- send you push notifications (if you choose to allow that function)—only for users 13 years old or older in the United States (16 or older in Europe)

For some purposes described above, FourSevenSeven may use and perform analytics. Analytics information supports business analysis and operations, allows product development, improves products and Services, personalizes content, provides advertising, and makes recommendations. Our legal basis for collecting and processing your personal information (for European users) is described above.

We will normally collect personal information from you only:

- when we have your consent to do so
- when we need the personal information to fulfill a contract with you and provide you with the Services, such as customer services, bug and service-error detection, and fraud prevention
- when the processing is in our legitimate interests (when we serve and measure the effectiveness of advertising or marketing campaigns, analyze your gaming activities, protect and improve our products and services) and not overridden by your rights, or
- when we have a legal obligation to collect personal information from you

4 – How we retain your information

FourSevenSeven retains, uses and stores your information as long as you are playing our games or using our Services, and also for the period necessary to fulfill all the purposes described in this Privacy Policy, in compliance with the applicable laws of your country of residence. We want to inform you that a longer retention period could be required to resolve disputes, or answer regulatory or police requests. In such cases, the collected information will be used and stored until the request is closed.

5 – How we share your information

With FourSevenSeven entities in order to operate the Services, your personal information may be transferred to other FourSevenSeven games

Studio studios or entities, subsidiaries, processors or third parties located worldwide as described below (please refer to “International operations and transfers of your information”).

With third parties

We use third-party services that have limited access to your information for specific purposes, such as administration, analytics, optimization, advertising, prize delivery, marketing assistance, customer service, and data analysis. They assist us with our operations.

Such third parties are authorized to use your information for these purposes only.

If you decide, while using our Services, to use social sharing features such as “Share” or “Like” on Facebook or other third-party social network sites, this may allow the sharing and collection of personal and non-personal information both to and from such third-party social networks.

You should visit the policies of such third parties for more information about their information-collection practices. Since FourSevenSeven is part of the Vivendi Group, your information may be transferred to Vivendi entities for global projects. In that case, you will be informed of the nature of the relevant projects and the entities involved, and you will be asked for your prior consent before any transfer of your information takes place.

With authorities

We reserve the right to report to law enforcement agencies activities that we, in good faith, believe to be illegal. We will investigate or take action to counter illegal activity, suspected abuse or unauthorized use of the Services, or to protect the property or safety

of others. We also may disclose your information if required by any law or court order worldwide, if the information relates to actual or threatened harmful conduct. In that case, we will consider applicable local laws, the nature of the order, as well as the legitimacy and proportionality of your information.

In case of sale of our company

In connection with any sale of our company or any line of business (including the assets relating thereto), customer information generally is one of the transferred business assets. In the event of an such sale or disposition of any or all of our business, your information may be transferred to the acquirer.

6 – International operations and transfers of your information

As part of our international operations, we may transfer personal information to our affiliates (which means subsidiaries, parent companies, joint ventures, and other corporate entities under common ownership of FourSevenSeven from time to time for our legitimate business purposes. FourSevenSeven is headquartered in Russian Federation, and we have operations, entities throughout the world. We have taken measures to ensure that your personal information is treated securely and lawfully, and that it receives an adequate level of protection in the jurisdictions in which we process it. If you are located in the European Economic Area (“EEA”) or Switzerland, we provide adequate protection for the transfer of personal information to countries outside of the EEA or Switzerland based on the standard contractual clauses authorized by the European Commission or other appropriate safeguards defined in Article 46, General Data Protection Regulation (GDPR) (EU) 2016/679.

7 – Security and confidentiality of your personal information

We have implemented security measures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the personal information collected through the Services. We take, and force applicable third parties to take, reasonable precautions to protect your personal information against loss, misuse, unauthorized disclosure, alteration, and destruction. However, please remember that no transmission of data over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your information, we cannot guarantee the security of your information and do not assume any responsibility for the unauthorized use of, or access to, your information that is under our control. When we use third parties to assist us in processing your personal information or credit card information, we take reasonable steps to require that they comply with this Privacy Policy and otherwise protect your personal information (including any credit card information). If there is a breach of security involving your personal information, including credit card information, from our Services, we will inform you immediately according to your local regulations relating to the notification of information Breaches, and take commercially reasonable steps to rectify such breach. If you believe your personal information is being improperly used by us or any third party, please immediately notify us via email at JulyTheFour@gmail.com.

8 – Children

We encourage parents to instruct their children about privacy and the way they use their information on the Internet. Children should never disclose their name, address or phone number, or any personal information, without their parents’ prior permission. We

consider a user to be a child if they are under the age of 13, unless more stringent regulation applies in their country of residence. In EU countries, users under the age of 16 are considered children, unless the data protection regulation of their country of residence specifies another age.

If we consider that any of our Services are directed at users under the minimum legal age required in their country of residence, we can block such users from using the Services or from providing information and/or limit the collection of information from such users as more particularly described below. No personal information should be submitted to FourSevenSeven by users under the minimum legal age required in their country of residence. We apply the following limitations to personal information collection for a user that is not of the minimum legal age required in their country of residence.

Such a user cannot: display his/her real name or any information in the games access the chat, leaderboard, forums, SNS (Facebook, Game Center, etc.)

- subscribe to newsletters
- use any other feature where users could appear under their real names With respect to such a user, we will prevent the collection and use of his/her precise geo location data and display to him/her contextual advertising only (excluding any behavioral advertising). Children can be invited to take part in testing our games (playtests) with their parents' authorization and/or their parents' physical presence being required depending on the country where the playtest is
- conducted.

Parents must exercise their privacy rights for their children. Please refer to the "Your rights" section of this Privacy Policy.

9 – Your rights

We ask that you keep the information that you provide to us updated. You can correct any information you have provided to us by contacting us through this form. You represent and warrant that all information you provide to us is true and correct, and relates to you and not to any other person. You can exercise your rights at any time and ask FourSevenSeven for access to, or rectification or erasure of, your information. According to your local regulations, if you are a European user, you can also request limitations to the processing of your personal information, object to the processing of your information, or exercise your right to data portability.

Please note that other third parties (our data partners) may be controllers of your information. You can obtain more details and opt out of the sharing of your personal information to third parties for any purpose by contacting us through this form. If you have previously consented to any direct marketing communication from us or subscribed to our newsletters, you can unsubscribe by clicking on a link available in each communication and newsletter we send you. If you want to decline to permit cookies or other tracking technologies, please read our Cookies Policy on our websites.

Please note that game functionality, Services and features can be affected by your actions. Some of your information and its processing is mandatory for FourSevenSeven to provide the Services. Your actions can oblige FourSevenSeven to stop providing the Services. When the conditions below apply, your game will be reset:

If you ask for the modification of this mandatory information, we may not be able to continue to link the game or game Services to you.

If you request limitations to processing that are mandatory for FourSevenSeven , or you object to such processing (in which case, we may not be able to provide you with the game or game Services).

If you withdraw your consent or ask for the deletion of your information.

If you withdraw your consent or ask for the deletion of your information, we will not use or process your information anymore but we will store it to answer regulatory or police requests. We also reserve the right to retain an archive of such information for a commercially reasonable time to ensure that its deletion does not affect the integrity of our data; and we further reserve the right to retain an anonymous version of such information.

Please specify your request through this form.

If you are a parent of a child who is under 13 years of age (or under another age specified by applicable regulations) and believe your child has provided us with information, please fill out this form and we will delete the information from our system.

To preserve the confidentiality of your information, we must be sure to correctly identify you. For this reason, please provide us with a copy of an official document that can prove your identity. This copy will be safely destroyed within two months of your request being received and closed.

Our team will look into your request and will answer you within one month, unless your request requires further investigation. You'll be specifically informed if that is the case. We remind European users that they have a right to lodge a complaint with a European Data Protection Supervisor.

10 – Third-party services

The Services may link to external sites that are beyond our control. This Privacy Policy only covers the way we treat personal information and non-personal information we collect on the Services. By accessing any external sites, you agree to the privacy policies of those sites. Please understand that external sites may have different policies with respect to the collection, use and disclosure of your personal information. We have no control over, and are not responsible for, the privacy practices of such third parties.

Therefore, you are encouraged to review the privacy policies of all third parties' services. Without limiting anything in the following section, we are not liable in any way for the actions, inactions or policies of any external services.

11 – Changes to our Privacy Policy

We reserve the right to change this Privacy Policy at any time. In the event that we make material changes to this Privacy Policy, they will be re-posted in the "Privacy" section of our websites and apps with the date the modifications were made indicated at the top of the page. Therefore, please review this Privacy Policy from time to time so that you are aware when any changes are made to it. Your continued use of the Services after such change(s) constitutes your acceptance of any such change(s), and if you do not accept any changes, you may choose not to use the Services or opt out by sending us appropriate notice. If you would like further information about any recent changes made, please send your request to JulyTheFour@gmail.com and include "Information about Changes" in the subject line.

12 – Legal disclaimer

Our Services operate AS IS, and we do not represent or warrant that our Services will be available at all times, or that your use of the Services will be uninterrupted or error-free. We are not responsible for your ability to access the Services or for matters beyond our control. This Privacy Policy is governed by the laws of your country of residence. Any dispute arising from the use of the Services shall be submitted to the competent courts of your country of residence.

13 –Advertising and Analytics services

Below are provider names of some of the third party analytics and advertising services we use. Please see the links below to learn more about the privacy policy of our third-party service providers.

Admob: <https://www.google.com/policies/privacy>

Unity Ads: <https://unity3d.com/legal/privacy-policy>

Google Analytics: <https://www.google.com/intl/en/policies/privacy/>

Firebase: <https://www.google.com/policies/privacy/>

Game Analytics: <http://www.gameanalytics.com/privacy>

AppLovin: <https://www.applovin.com/privacy>

IronSource: <http://www.ironsrc.com/wp-content/uploads/2017/01/ironSource-Privacy-Policy.pdf>

Appodeal: <https://appodeal.com/privacy-policy/>

14 – How to contact us

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please contact us by sending an email to JulyTheFour@gmail.com