

PRIVACY POLICY

Last Update: 10 July 2023

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR PERSONAL DATA (AS DEFINED BELOW).

This Privacy Policy explains how we, "FMLY", and affiliated companies (collectively, "we", "us", "our") collect, use, secure or otherwise processes personal data of users ("you" or "your") when you use our Services.

This Privacy Policy applies to our games, apps, websites and other services (together the "Services", "Products" or "games", "apps", "websites" for individual categories).

1. WHAT DATA WE COLLECT

While using our Services, we may collect certain information that can be used to identify you ("personal data"). The personal data we collect will depend on the circumstances and the Services you are using. In general, data we collect include: (a) data you submit to us; (b) data we collect automatically; and (c) data we collect from our partners.

(a) Data you submit to us

- Authorization and/or Account Information. When you sign up for an account, we require certain information such as your email address or Facebook ID or Google ID - depending on the Services settings.
- Content Information. i.e. photos, pictures, video and audio files, documents and other data that you upload using the Services.
- Personal Information which you may fill in or provide by yourself when the app is designed for tracking your info, storing your records and/or managing them for your convenience and upon your explicit request.
- Other data you choose to give us. We may also collect other information you submit to us when using our Services. For example, we collect your information when you contact us through the contact feature embedded in our Services or when you send us an email directly.

(b) Data we collect automatically

- Device information. When you download and use our Services, we automatically collect information on your device, such as device identifiers (device ID, advertising ID, MAC address, IMEI), the type of device you use, operating system, resolution, application version, language and time zone and IP address.
- Cookies and similar technologies. Our advertising networks and their partners may use cookies and similar technologies, such as mobile "SDK", to provide our Services and to provide targeted advertisements.

- Location data. We may collect information related to your location such as general location data (country, region, city), region information of your mobile device, region associated with your SIM card. We may also collect precise geo-location data (GPS, with your consent).
- Usage Information. We collect data about your use of the Services, for example date and time you used a service, features you have used and how you have used them, in-app purchases history, subscriptions, and advertising that you click on, and data generated when you use our Services.
- Other information. Sometimes we may collect upon your permission other information such as precise geolocation (latitude and longitude). If you decline permission for us, we will not collect it. Similarly, we may ask for access to your camera in case you want to use certain features of our Services.

(c) Data we collect from our partners

- Information from social network(s). You may choose to connect to our Services via your social media account, e.g. Google, Facebook. In this case we may receive certain information from such social network. The information we receive depends on the Services you are using and policies of social network. You may find such policies on web-site of social network.
- Information from our analytic service providers. We may receive information about you from our analytic service providers with data they collect through our Services in accordance with their own privacy policies.
- Information from our advertising partners. From time to time, we may also receive personal information about you from other third-party sources. For example, if you clicked on an advertisement to direct you to one of our Services, we may receive information from which ad network and advertising campaign the install originated from.

2. WHY WE COLLECT YOUR DATA

We use the data we collect about you to deliver our Services to you. We also use it for improving and monitoring our Services. In addition, we use your information to provide you with interest-based advertising or other targeted content and to keep the Services safe and fair.

(a) To deliver our Services to you

We process data to provide you with all requested Services. Our legal basis is performance of a contract with you which you entered into with us when you download our Products and accept our End User License Agreement (“EULA”).

For this purpose we process your data, in particular, to:

- Allow you to use our Services;
- Operate the Services;
- Verify and confirm payments;
- Provide and deliver products and services you request;
- Send you Services-related communications;

(b) To improve and monitor our Services

We process data to provide a great Services to you. Our legal basis is legitimate interests to run our business and make high-quality Products.

For this purpose we process your data, in particular, to:

- Improve and Optimize our Services;
- Customize your Services experience;
- Respond to your comments and questions and provide user support;
- Provide you our offers in the Services;
- Better understand user behavior and trends;
- Detect potential outages and technical issues.

(c) To provide you with interest-based advertising or other targeted content.

We process data for serving personalized advertising and content. Our legal basis is legitimate interests to run our business and provide you with best content and advertising. For information on how to opt-out from personalized advertisements, see section “Your rights and options” below.

For this purpose we process your data, in particular, to:

- Show ads that may be of interest to you based on your preferences;
- Provide personalized content and information to you, which can include online ads or other forms of marketing;
- Send you marketing notifications and receive your feedback about your user experience;
- Track the content you access in connection with the Services and your online behavior;
- Deliver, target and improve our advertising and the Services.

(d) To keep the Services safe

We process data for safety purposes. Our legal basis for such processing is legitimate interests for protecting our business and Services.

For this purpose we process your data, in particular, to:

- Prevent, detect, and investigate fraud, security breaches, potentially prohibited or illegal activities,
- Protect our trademarks and other intellectual property rights;
- Enforce our EULA.
- Take action against fraudulent or misbehaving users

3. WHO CAN SEE YOUR DATA

Apart from us, your data can be accessed by others in the following situations:

(a) Other players and users

Social features are a core component of some Products. When you use some games and apps other players and users may, for example, see your profile data, in-game activities and read the messages you have posted.

(b) Other companies and public authorities

In order to combat fraud and illegal activity, we may exchange data with other companies and organizations and provide it to public authorities in response to lawful requests. We may also disclose your data based on your consent, to comply with the law or to protect the rights, property or safety of us, our users or others.

(c) Our Service Providers and Partners

We use third parties to help us operate and improve our Services. These third parties assist us with various tasks, including hosting and maintenance, on-going development, analytics, customer care, marketing, advertising. We may also share information with advertising partners who distribute advertising in our Services.

4. WHERE YOUR DATA CAN BE TRANSFERRED

Our Services are global by nature and your data can therefore be transferred to anywhere in the world. Please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as in your jurisdiction.

We try to make sure that the recipient of any personal data provides a proper protection of the personal data received. Adequate safeguards that our partners may include compliance with the rules and procedures known as the EU-US Privacy Shield, or under contractual provisions which have been deemed by the European Commission to provide sufficient safeguards for personal data.

For the purposes of data storage, we recourse to the services of the hosting organizations. We take your privacy seriously and, therefore, encrypt your personal data before sending it to the hosting organizations for the purposes of its storage. Please note that we cooperate only with those hosting organizations that have passed our security and reliability check.

We take steps to ensure adequate safeguards are in place to protect your data.

5. HOW LONG WE STORE YOUR DATA

We generally store your data for as long as your account is in existence or as needed to provide the Services. However, specific period can vary based on context of the processing we perform and on our legal obligations. For example, we may need to retain some of your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations, or where we have a legitimate interest in doing so.

When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or depersonalize it so that we cannot identify you.

6. WHAT RIGHTS YOU HAVE

You have certain rights in relation to personal data. If you have any requests related to your rights please contact us as described in section “HOW YOU CAN CONTACT US” below.

(a) Opt-out of targeted advertising

You can opt-out of interest-based advertising on mobile applications by checking the privacy settings of your Android or iOS device.

Apple devices:

1. Open Settings
2. Select Privacy
3. Select Advertising and enable "Limit Ad Tracking"

Android devices:

1. Open Settings
2. Select Google
3. Select Ads and enable "Opt out of Ads Personalization"

(b) Opt-out of marketing emails and other direct marketing

You may opt-out of receiving promotional communications from us, such as marketing emails, by following the instructions in such communications.

(c) Access the personal data we hold about you

If you request, we will provide you a copy of your personal data in an electronic format.

(d) Your other rights

You also have the right to correct your data, have your data deleted, object how we use or share your data, and restrict how we use or share your data. You can always withdraw your consent, for example by turning off GPS location sharing in your mobile device settings.

We will respond to all requests within a reasonable timeframe. You may also contact your local data protection authority for unresolved complaints.

7. HOW WE PROTECT YOUR DATA

In order to help ensure a secure and safe user experience, we are continuously developing and implementing technical and organizational security measures to protect your data from unauthorized access or against loss, misuse or alteration.

8. WHAT ARE AGE LIMITS FOR OUR SERVICES

We appreciate the need to provide extra privacy protections to users who are children. Our Services are intended for use only by those aged 16 and over. We do not knowingly collect personal information from children under 16 years of age. In order to request the deletion of personal data, for any reason, please use the in-app support feature in our Services or contact us at the address provided below and we will take reasonable measures to promptly delete such personal data from our records.

9. HOW WE CAN CHANGE THIS PRIVACY POLICY

We reserve the right to change our practices and this Privacy Policy at any time. Each time you accesses our Services the current version of the Privacy Policy applies, and you agree that the personal data will be processed subject to the Privacy Policy, as updated. We encourage you to check this page regularly so that you know our current practices.

10. HOW YOU CAN CONTACT US

If you have any questions or requests, you may contact us and our data protection officer using the in-app support feature in our Services, "Contact Us" form on our websites or via e-mail eddy.balchi.acc@gmail.com.

The data controller under this Privacy Policy is "FMLY", with a registered address at Eduardo Andre g. 14-5, Vilnius 02231