

City From Naught Privacy Policy

City From Naught Inc. (“City From Naught”, “we”, “us”, “our” and terms of similar meaning) take your privacy rights very seriously. We are committed to transparently describing our privacy practices, including how we collect, use and disclose data we obtain from your activity. The Product includes any game, software, application and newsletter published by City From Naught.

We encourage you to read and understand our privacy policy (“Privacy Policy”) before using the product. By accepting the Privacy Policy by using the product, you expressly consent to our collection, use and disclosure of your Data in accordance with this Privacy Policy.

All capitalized terms that are not otherwise defined herein obtain their meaning from the Terms.

1. What Information Do We Collect?

General. The Product does not collect or solicit any personal or personally identifiable information from any of its users. Our primary purpose in collecting Data from you voluntarily is to provide you with safe, smooth, entertaining and customized experiences when using the Product.

Newsletter. We use our mailing list to give you updates about our products. If you subscribe to our newsletter, we add your email address to our mailing list. We track link clicks and email bounce events to improve our newsletter, and to periodically remove inactive subscribers. You can always unsubscribe from our newsletter by clicking the Unsubscribe button in our emails.

Gameplay Data. Data from gameplay sessions may be collected and stored both on the local device and within the user’s Steam account. This includes information such as game progress, settings, and session statistics.

User Actions. During the demo version of the game, we may collect anonymized data about your in-game actions. This includes mouse clicks, key presses, and any text entered into the game (e.g., for chat, commands, or feedback forms). This data helps us better understand player behavior and improve gameplay balance, user interface, and overall game design. No personal or identifying information is collected or stored in this process.

User Feedback. If you choose to report a bug or send feedback, we may collect the information you voluntarily provide, such as save files, screenshots, and written descriptions. This information is used solely to improve the Product and address reported issues.

2. How Do We Use Your Information and Data?

We may use your Data to provide you with a license for the Product; to deliver the Product itself; resolve service disputes; troubleshoot problems; improve our content and product offerings;

detect and protect against errors, fraud, and other criminal activity; provide system or administrative messages; and/or as otherwise described at the time of collection.

We also use gameplay data—including user actions such as clicks, inputs, and interaction patterns—to better understand player behavior and continuously improve the design, balance, and usability of the game. These uses help us enhance the Product and tailor it to your preferences, offering a safe, smooth, entertaining, and customized experience.

3. Our Disclosure of Your Information and Data

General Disclosure. We may share your Data with third parties only in the ways that are described in this Privacy Policy and in accordance with your consent.

Subsidiaries, Affiliates & Service Providers. We may use the services of subsidiaries, affiliates and third party service providers (collectively, “Third Parties”) in connection with our provision of the Product and/or off-premise data hosting. We may disclose your Data to the Third Parties in the course of our use of their services. We take care to use Third Parties that we believe are reputable and capable of performing the services we require of them, including, without limitation, the handling of confidential information and Data and the compliance with all applicable laws. No data will be shared with Third Parties without acquiring your explicit consent.

Cookies. We may use third-party analytics tools for anonymized statistics on this website.

Laws and Jurisdictions. Notwithstanding anything to the contrary in this Privacy Policy, we may preserve or disclose your Data if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or any other person’s or entity’s rights or property. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party’s, including a government’s, request to disclose your Data.

Sale of Business. We may disclose Data to the acquirer or its agents in the course of the sale of our business. If we do this, the disclosure will be subject to confidentiality arrangements customary in such transactions.

Storing and Processing Your Information and Data. In some cases, Data that we collect may be stored or processed outside of the jurisdiction it is received. When that occurs we continue to protect the Data with appropriate safeguards and data export requirements, but it may be subject to the legal jurisdiction of those countries and governmental authorities in those countries.

5. Your Information and Data Rights

In accordance with the applicable privacy laws, you shall have the following rights with respect to your Data:

Right of Access and Portability. You may ask for an overview or copy of your Data to be provided to you; and/or transferred to another organization.

Right to Erasure and Restriction. We may retain your Data already collected for legitimate business interests, to collect any fees owed (if and as applicable), resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our Terms and/or take other actions as required or permitted by law.

Right to Object. You may object to us processing your Data.

Right to Withdraw Consent. Where we have asked for your consent to use and/or process your Data (if applicable), you can withdraw this consent at any time. We will do our best to accommodate your request, subject to applicable laws and the terms and conditions of this Privacy Policy.

Please contact us at info@cityfromnaught.com if you would like to exercise any of the above rights.

6. Children's Privacy

We do not and will not knowingly collect personal data from children under the age of 13. If we learn that we possess personal data of an individual under 13 years old, we will make sure to erase such data from our records. If the individual is subscribed to the newsletter, it will result in a suspension of the subscription.

7. Security

We strive to protect your Data by putting in place a range of technical and organizational measures to safeguard and secure the Data we receive from you, including without limitation, security technologies. We are continuously utilizing security measures to protect your Data from unauthorized access or against loss, misuse or alteration. Despite our efforts, we cannot guarantee the security of your Data. Unauthorized entry or use, hardware or Product failure and other factors, may compromise the security of your Data at any time. We reserve the right, without any limitation, to investigate any suspected breaches of the Product's security or information technology or other systems or networks.

8. Changes to This Privacy Policy

We may introduce changes to this Privacy Policy in the future. We will post an updated version on this page, and if appropriate, we will notify you about the changes via email.

9. Questions?

It is our goal to make our privacy practices easy to understand. If you have questions, concerns or if you would like more detailed information, please email our data controller at info@cityfromnaught.com.

Last updated: May 27, 2025