

## PRIVACY POLICY

Effective from 19-06-2022

### INTRO:

Hello! Welcome to the Artik Games Privacy Policy “Your Privacy is important to us”. This policy describes how Artik Games and Vasco Games (collectively described as “Artik Games”, “we”, “us” or “our”) collect, use, process and share information about you.

Artik Games makes games that offer fun and entertainment experiences for everyone to enjoy. Artik Games respects the privacy of everyone who uses our games, website(s) and all related services which we may provide to you from time to time (“Services”).

### This Privacy Policy describes:

- § The ways we collect personal data about you and why we do so
- § How we use your personal data
- § The choices you have about your personal data.

## CONTACT US

If you have questions about data protection, or if you have any requests for resolving issues with your personal data, we encourage you to primarily contact us through the game/publisher so we can reply to you more quickly.

Name of the Controller: Artik Games B.V.

Address: Weerdingerstraat 36 7815 SC Emmen, The Netherlands

Email: support@Artikgames.com

## THE DATA WE COLLECT

### *Data you provide us.*

- § Contact information (such as name and email address)
- § Player name and password
- § Profile information (such as profile photo)
- § Your messages to the Service (such as chat logs and player support tickets)
- § Other data you choose to give us (such as data to identify a lost account)

### *Data we collect automatically.*

- § Data about your account and game progress
- § Your IP address and mobile device identifiers (such as your device ID, advertising ID, MAC address, IMEI)
- § Data about your device, such as device name and operating system, browser type and language
- § Data we collect with cookies and similar technologies (see more below)
- § General location data
- § Precise geolocation data (GPS, with your consent)
- § Data about your use of the Service, such as gameplay data and your interactions with other players inside the Service
- § In most cases, we also create a Games ID for you when you use the Service.

### **Data we collect from our partners.**

- § Data we receive if you link a third party tool with the Service (such as Facebook, Kakao or Google)
- § Demographic data (such as to determine the coarse location of your IP address)
- § Data to fight fraud (such as refund abuse in games or click fraud in advertising)
- § Data from platforms that the games run on (such as to verify payment)
- § Data for advertising and analytics purposes, so we can provide you a better Service

### **WHY DO WE COLLECT YOUR DATA**

#### ***To make the Service work.***

To perform the contract, we process data necessary to

- § Create accounts and allow you to play our games and use our Service
- § Operate the Service
- § Verify and confirm payments
- § Provide and deliver products and services you request
- § Send you Service-related communications

#### **To make the Service more suitable for our players.**

To provide a great Service to our players, we have a legitimate interest to collect and process necessary data to

- § Update and develop player profiles

- § Develop and improve the Service and player experience
- § Manage our relationship with you
- § Provide social features as part of the Service
- § Customize your Service experience
- § Respond to your comments and questions and provide player support
- § Provide you Artik Games offers in the Service as well as in other websites and services, and by email
- § Send you related information, such as updates, security alerts, and support messages
- § Enable you to communicate with other players

***To show personalized advertisements.***

To show you personalized advertisements in the Service as well as in other websites and services (including email) we have a legitimate interest to process necessary data to

- § Track the content you access in connection with the Service and your online behavior
- Deliver, target and improve our advertising and the Service
- § For information on how to opt-out from personalized advertisements, see section 'Your rights and options' below.

***To keep the Service safe and fair.***

Ensuring a level playing field in the Service is a top priority for us.

In order to keep the Service and its social features safe and fair, to fight fraud and ensure acceptable use otherwise, we have a legitimate interest to process necessary data to

- § Analyze and monitor use of the Service and its social features
- § Moderate chats either automatically or manually
- § Take action against fraudulent or misbehaving players

**To analyze, profile, and segment.**

In all of the above cases and purposes, we may analyze, profile and segment all collected data.

**With your consent.**

With your consent, we may process your data for additional purposes, such as using your GPS location to show you local events.

**WHO CAN SEE YOUR DATA**

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

#### **OTHER PLAYERS AND USERS.**

Social features are a core component of our games. Other players and users may, for example, see your profile data, in-game activities and read the messages you have posted.

#### **PARTNERS WORKING FOR Artik GAMES**

Artik Games partners to perform services for us. These partners process your data only at and according to Artik Games instructions to provide the Service, such as hosting, player support, advertising, analytics and fraud prevention.

#### **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 players or others.

#### **Advertising and Social Media partners.**

The Service includes features from our partners, such as social media interaction tools and in-game advertising. A list of these partners is available on request [support@Artikgames.com](mailto:support@Artikgames.com) . These partners may access your data and operate under their own privacy policies.

#### **INTERNATIONAL DATA TRANSFERS**

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Policy. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission and the Privacy Shield certification in case of transfers to the USA.

#### **YOUR RIGHTS**

You have certain rights in connection with your personal information and how we handle it. You can exercise these rights at any time by contacting us via any of the methods set out in the Contact Us section at the top of our privacy policy

#### **those rights include:**

- § **Right of access.** You have a right to know what information we hold about you and in some cases to have the information communicated

to you. If you wish to exercise this right please contact us letting us know that you wish to exercise your right of access and what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for, for instance if the information includes personal information about another person. Where we are not able to provide you with information that you have asked for, we will endeavour to tell you why. We will try to respond to any request for a right of access as soon as possible, but we will always do so within 1 month of receipt of your request and verification of your identity.

§ **Right to correct personal information.** We try to keep the information that we hold about you accurate and up to date. Should you realise that any of the information that we hold about you is incorrect, please let us know at [support@Artikgames.com](mailto:support@Artikgames.com) and we will correct it as soon as we can.

§ **Data deletion.** In some circumstances you have a right to have some of the personal information that we hold about you deleted. Should you wish to have any information about you deleted, please Contact Us using the information below. Please note that in order to process your request you must delete our games from your mobile devices and clear our cookies from any device where you have played our games in a web browser. Where we delete personal information about you, we may still retain some or all of that information for other purposes such as maintaining financial records, protecting or enforcing legal rights, maintaining marketing suppression lists or for technical reasons such as maintaining technical security or our database integrity. We may also retain your information in an anonymised form. In some instances, personal information about you that is visible through gameplay such as username, avatar, your high scores and any chat messages may be cached on other players' devices and we may not be able to remove or update that data from those devices, for example if that device is not connected to a wifi network.

§ **Account deactivation.** If you have created an account with us, you can ask us to deactivate that account by contacting us using the information below. We may ask you for other information before we are able to deactivate your account. That information might include information about your mobile device. Other steps you should take should you wish to completely deactivate your account include disassociating your Facebook account from our mobile games and deleting our games from your mobile devices. Please note that if you completely deactivate your account all your progress in our games

and any unspent virtual items, such as Gems or Boosters will be lost and we may not be able to restore them in the future.

- § **Data portability.** In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller.
- § **Restriction of processing.** In some cases, you may have the right to request a restriction of the processing of your personal data, such as when you are disputing the accuracy of your data held by us.
- § **Right to object.** You have the right to object to the processing of personal data about you which is processed on the grounds of legitimate interests (see Legal Bases below).
- § **Direct marketing opt out.** If you have elected to receive direct marketing communications from us, you can change your mind at any time by following the opt out link in any marketing communication that is sent to you. If you have elected to receive more than one type of marketing communications from us, you may need to opt out of all of them individually. It may take a few days for us to update our records before any opt out is effective.

There are other ways in which you can control the personal information that we collect about you. For instance, you could disconnect your Facebook or other social network account from our games, or delete our games from your mobile device. You could also reset your mobile advertising identifier or limit ad tracking altogether using the settings in your phone. Finally, you could limit or prevent the use of cookies in your web browsers. More information on all of these options is provided elsewhere in this Privacy Policy.

## COOKIES AND SIMILAR TECHNOLOGIES

Like most online services, we and our partners use cookies and similar technologies to provide and personalize the Service, analyse use, target advertisements and prevent fraud. You can disable cookies in your browser settings, but some parts of the Service may then not function properly.

This Policy does not apply to, and we are not responsible for the data collection practices of these third party advertisers, and we encourage you to check their privacy policies to learn more about their use of cookies and other technology. Our main partner who helps us providing our analytics and ad serving is Google (Analytics/Admob). Privacy Policy: <http://www.google.com/policies/privacy/>

## HOW DO WE PROTECT YOUR DATA

Security Safeguards.

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

### **DATA RETENTION**

We retain your data for as long as your account is active or as needed to provide you the Service. We will for example periodically de-identify unused game accounts and we regularly review and de-identify unnecessary data.

Note that if you ask us to remove your personal data, we will retain your data as necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **AGE LIMITS / CHILDREN**

We do not knowingly collect or solicit personal data about or direct or target interest based advertising to anyone under the age of 13 or knowingly allow such persons to use our Services. If you are under 13, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 13 may provide any personal data. If we learn that we have collected personal data about a child under age 13, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 13, please contact us.

### **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time and we will post the updated Privacy Policy on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new policy will be effective from the date it is published by us.