

## PRIVACY POLICY

*Last modified: February 9, 2020*

### **1. Who We Are**

**1.1** We are Game Garden Limited, a Cyprus company, located at 2A Ilia Venezi Street, Athienitis Strovolos Park, Office 402, 2042, Nicosia, Cyprus (“**Game Garden**” or “**We**”). We develop and distribute our games throughout the world in cooperation with other companies operating pursuant to a contract with Game Garden.

**1.2** This Privacy Policy sets out how we collect and use your personal information when you play our games or otherwise access any of our other products, services, content, game-garden.com, and other domains provided by Game Garden (“**Services**”) and the choices available to you in connection with our use of your personal information (the “**Privacy Policy**”).

This Privacy Policy should be read alongside, and in addition to, our Mobile Application End User License Agreement (“**EULA**”), which is available [here](#). In case of any contradictions between this Privacy Policy and the EULA, this Privacy Policy will prevail.

**1.3** This Privacy Policy describes:

- a. what types of information we may collect or that you may provide;
- b. how we process, store, and use the information and with whom we share it;
- c. how you can access and update that information or request its deletion;
- d. the choices you can make about how we collect, use, and share your information;
- e. how we protect the information we store about you.

This Privacy Policy does not apply to any third party websites, services, or applications, even if they are accessible through any of our Services.

By downloading, accessing and/or playing our games, or interacting with our websites or other Services, you agree to the collection and use of your information in accordance with this Privacy Policy, including consenting to Game Garden’s and our advertising partners’ use of your data for targeted advertising purposes as described in the Marketing and Advertising sections of this Privacy Policy. If you have any concerns about providing data to us or having it used in any manner permitted in this Privacy Policy, you should not use our Services. As set out in the EULA, you must be at least 13 years old to access and/or use our Services.

### **2. This Privacy Policy**

**2.1** By making available the Services we, acting reasonably and in good faith, believe that you:

- a. have all necessary rights to register on and use the Services;
- b. provide true information about yourself to the extent necessary for use of the Services;
- c. understand that by the posting your personal information, if there is such technical possibility in the Services and where it is accessible by other users of the Services, you have manifestly made this information public, and this information may become available to other Site users and internet users, be copied and disseminated by them;
- d. are aware of and accept this Privacy Policy.

**2.2** We do not check the user information received from you, except where such check is necessary in order for us to fulfill our obligations to you.

**3. Information We Collect and How We Collect It**

**3.1** In order to implement the agreement between you and us and provide you with access to our Services, we will improve, develop, and implement new features to our Services and enhance the available Services’ functionality. To achieve these objectives, and in compliance with applicable laws, we will collect, store, aggregate, organize, extract, compare, use, and supplement your data (hereinafter “**Processing**”). We will also receive and transfer this data, and our automatically processed analyses of this data to our affiliates and partners as set out in the table below and Section 4 of this Privacy Policy.

**3.2** Details about the information we collect when you use our Services, why we collect and process it, and the legal bases are set forth below.

<b>Information Collected</b>	<b>Purpose</b>	<b>Legal Basis</b>
<p>Unique Player ID, which is automatically created for you by our game server when you first start using the Services.</p>	<p>We use this information in order to manage and administer the Services provided to you, identify your in-game actions, track your progress, and match your purchases to your account.</p> <p>We use this data to enable us to fulfill our obligations to you as part of the Services (e.g. in cases where you request restoration of your account and progress or contact us to correct errors with in-game purchases).</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>
<p>Your nickname if you choose to create one.</p>	<p>We provide you with the option to create a nickname that is then matched with your game profile for purposes of in-game competitions between players and for leaderboards.</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>
<p>Additional data received automatically when you access the Services, whether on a mobile device or on a computer, including information about your device, such as your IP-address, device IDs (MAC Address, Identifier For Advertising (IDFA), Google Advertising ID (GAID), unique device identifier (UDID), and/or International Mobile Equipment Identity (IMEI), and unique IDs for push notifications), country and language settings, device model and operating system used, your installed apps, type of browser, your Internet provider and/or phone network operator, network type, screen resolution, RAM size and your browsing behavior.</p>	<p>We use your data for internal review and game analytics in order to constantly improve the content of our Services, optimize your user experience, understand any errors you may encounter when using the Services, prevent fraud, notify you of changes to the Services, and personalize your use of our Services.</p> <p>We use this information in order to tailor and improve the advertisements that may be presented to you within the Services and measure the effectiveness of these advertisements, as described in more detail below.</p>	<p>Legitimate interests</p>

<p>Details about your usage of the Services, such as the date and time you installed our game or Service, the date and time you accessed our game or Service, your game progress and various in-game activities, such as, for example, spending in-game currencies, and system and game error reports.</p>	<p>We use your data for game analytics and in order to constantly improve the content of our Services, optimize your user experience, understand any errors you may encounter when using the Services, prevent fraud, notify you of changes to the Services and personalize the use of our Services.</p> <p>We also use your data to provide you with customer support should you encounter any problems with our Services.</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>
<p>Additional information that you provide to us when you enter a promotion or contest or report an issue with the Services to us.</p>	<p>We use your data for game analytics and in order to constantly improve the content of our Services, optimizing your user experience, and to understand any errors you may encounter when using the Services.</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>
<p>Information that is automatically received at the time of access to the Services with the use of cookies.</p>	<p>Game-Garden.ru and Game-Garden.com use cookies solely to save your language preference and do not use any type of third-party cookies or analytics.</p>	<p>Consent</p>
<p>Limited payment information if you make in-game purchases within our Services, such as unique transaction ID, date and time of payment, and the payment amount. We do not receive or store any billing and payment information that you provide when your purchase is processed by a mobile app store (such as Apple or Google) or by a social network (such as Facebook).</p>	<p>We use this information to resolve any errors that may occur with payment processing through the appropriate store or platform to ensure that your purchase can be applied to your account.</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>
<p>Information that is created by you while using the Services (if there is such technical possibility in the Services). This information can be available to some or all other users of our Services.</p>	<p>We use this information in order to manage and administer the Services including providing our services to you.</p>	<p>Legitimate interests, which inter alia, include the processing of data that you expressly made public where it is accessible by other users of the Services.</p> <p>Performance of our contract with you</p>
<p>Information submitted by you</p>	<p>We use this information in order to</p>	<p>Legitimate interests</p>

<p>while requesting assistance from our customer support, such as your name and e-mail address, data about your game play and activity on our Services, your player and/or social network ID number, and other information that may be requested by our customer support team in order to assist you, such as screenshots or payment transaction IDs.</p>	<p>verify your identity and to fulfill your support request.</p> <p>We may also use this data in order to investigate any complaints on your behalf and to provide you with a more efficient service.</p> <p>We will also store all your communications with our customer service team and any information in those communications in order to provide support.</p> <p>For your convenience, we provide the option of contacting our customer support from the mobile applications and the desktop Services. If you choose to use our in-Service interface, some information will be added to your support ticket automatically, such as your unique player ID assigned to you when you downloaded the game, platform, and information about your operating system, your device or desktop computer, and your screen size.</p>	<p>Performance of our contract with you</p>
<p>Data collected via third parties, including your social network IDs, application store IDs, first and last name, photo, nickname, friends list, when you choose to log into our Services via your social or application store accounts (Apple Game Center, Google Play Game Services, or Amazon Game Circle) and/or connect your social account to our Services (e.g. Facebook, Twitter). We will also receive access to your e-mail address, if the social media platform shares it, but we will not store it.</p>	<p>We use this information in order to manage and administer the Services provided to you and to allow you to synchronize your game progress across multiple devices.</p> <p>We use this information for certain social functions of our Services, such as to show you your friends who play the same game(s) as you and their progress and to allow you to invite friends to play or send them in-game gifts.</p> <p>We also use this information in order to provide you with updates and information on our and selected third parties' products and services in which we think you may be interested.</p> <p>You can control what information is shared with us from your social media account by reviewing the privacy controls on the appropriate third party network. We recommend that you review the social network's privacy</p>	<p>Legitimate interests</p> <p>Performance of our contract with you</p>

	policy to learn more about the information they share with us and other developers and the choices you can make to limit the accessible information.	
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**3.3** Our legitimate interests include the following: (1) maintaining and administering the Services; (2) providing the Services to you; (3) improving the content of the Services and our web pages; (4) processing the data that you expressly made public; (5) ensuring your account is adequately protected; and (6) compliance with any contractual, legal, or regulatory obligations under any applicable law.

**3.4** As part of maintaining and administering the Services we use the information to analyze user activity and ensure that rules and terms of use for the Services are not violated.

**3.5** Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body, or agency or in the defense or enforcement of legal rights. We will not delete personal information if it is relevant to an investigation or a dispute. We will store the relevant information until those issues are fully resolved and during the term that is required or permissible under applicable law.

**3.7** Please note, if you do not want us to process sensitive and special categories of data about you (including data relating to your health, racial or ethnic origin, political opinion, religious or philosophical beliefs, sex life, and your sexual orientation) you should take care not to post this information or share this data within our Services. Once you have provided this data it may be accessible by other users and it becomes difficult for us to remove this data.

**3.8** Please note, if you withdraw your consent to processing or you do not provide the data that we require in order to maintain and administer the Services, you may not be able to access the Services.

**3.9** If we intend to further process your data for any purpose other than the purposes set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

**3.10 Marketing and Advertising**

Our games and Services may include advertising for third party products and services, and we, or our third party partners, may send you marketing communications about other Game Garden games and related services based on your interests. For example, we may serve ads within our games and Services or place ads on third party websites or apps. Unless you opt out as explained below, you consent to us and our advertising partners collecting and using information about you to improve marketing and advertising so that we can show you relevant third party ads in our games or Services.

We and our third party partners use ad identifiers, such as ID for Advertisers (IDFA), Google Advertising ID (GAID), or unique device identifier (UDID), and other information collected from your devices, social networks, and provided by you to offer you ads that may be relevant to you within our games and Services.

When you play our games or use our Services, the ad identifiers and other information from your device is collected and shared with advertising partners to enable the delivery of ads to your device. Our marketing and advertising partners may combine such information with data they collected from you elsewhere (for example when you used their services) and use it to serve you more relevant ads or to improve the accuracy of their targeting and measuring systems.

By playing our games and using our Services, you consent to the collection and use of your data for targeted advertising purposes by our partners as set forth in this Privacy Policy and our partners' policies, including, but not limited to the following: [Unity](#), [Appsflyer](#), [Chartboost](#), [Eyber](#), [ironSource](#). You

can refuse or withdraw your consent to such use at any time by preventing your device's ad identifier being used for interest-based advertising by updating your device's settings.

Opting out of interest based advertising and marketing will not prevent you from being able to play our games or use our Services and will not disable the advertising within the games or Services, but such ads will no longer be targeted based on the information that we hold about you. The ads may still be based on the game you are playing or the Service you are using or the region in which your device is located.

#### **4. Data Sharing**

**4.1** We take technical and organizational measures to ensure that your data is safe. Please note that by posting your personal information (if there is such technical possibility in the Services) you have expressly made this information public, and it may become available to other Service users and Internet users and be copied and disseminated by them.

**4.2** We may share your data with our affiliates, contractors, and service providers, who are subject to contractual confidentiality obligations no less restrictive than our obligations to you under this Policy. Sometimes we may also need to share your data with a third party in order to provide our Services to you or to administer the Services, for example if you choose to share your data across other social media platforms.

**4.3** Our Services, games or their purchase pages may display an "offer wall" that is hosted by an offer wall provider. The offer wall allows third party advertisers to provide virtual currency to you as a player in exchange for interacting with an advertisement or completing a marketing offer that may include signing up for an account with one of those advertisers. These offers are not made by us. These offers may be made available to you based on certain technical information, like your geographic area or de-identified demographic information. To properly credit your player account and to prevent fraud, a unique identifier, in some cases your social network ID or Game Garden player ID, will be shared with the offer wall provider.

#### **5. Privacy Settings**

**5.1** The Services may contain links to sites operated by third parties. We are not responsible for your data privacy when you access these links or engage with third party services and you should review the relevant third parties' privacy statements which will govern your data privacy rights.

**5.2** We will not be liable for the actions of third parties who may obtain access to your information as the result of your use of the Internet or the Services and in accordance with the confidentiality level selected by you.

**5.3** We will not be liable for the consequences of use of the information which, due to the nature of the Services, is available to any Internet user. We ask you to take a responsible approach to the amount of information you choose to share publicly through our Services.

#### **6. International Transfers**

We may transfer and maintain on our servers or databases some of your personal information in different countries worldwide, including outside of the European Union (for example, in Russia) and take reasonable cyber security measures to ensure your data is adequately protected.

#### **7. Retention Periods**

**7.1** We will retain your personal information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law. We keep your information for

so long as your account is active, and we deem an account to be active for a period of 60 months from the last interaction with our games or Services.

**7.2** We may remove your account, or the information you post as provided by the EULA.

## **8. Your Rights**

**8.1** You have the following rights, in certain circumstances, in relation to your personal information:

- a. Right to access your personal information;
- b. Right to correct your personal information — you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing;
- c. Right to restrict the use of your personal information;
- d. Right to request that your personal information is erased;
- e. Right to object to processing of your personal information;
- f. Right to data portability (in certain specific circumstances);
- g. Right not to be subject to an automated decision;
- h. Right to lodge a complaint with a supervisory authority.

**8.2** We strive to provide you with choices regarding the personal information you provide to us. Here are some of the mechanisms we provide for you to control certain uses and disclosures of over your information:

- a. Tracking Technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly.
- b. Information from Social Networks. To manage the information Game Garden receives about you from a social network, like Facebook, where you play our games or with which you link a game on your mobile device, you will need to follow the instructions on that site for updating your information and changing your privacy settings.
- c. Information from Your Mobile Device. You can manage some aspects of information collection and use by visiting the “settings” menu of your mobile device and reviewing the permissions for each application or “app.”

**8.3** If you want to review, delete, or change the information Game Garden has about you or have additional questions, e-mail us at [info@game-garden.com](mailto:info@game-garden.com). We will aim to respond to you within period established by applicable law. We will need to verify your identity before we are able to disclose any personal data to you. Please note that certain records, for example those related to customer service matters, will be held for legal and accounting purposes.

## **9. Security Measures**

**9.1** We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data is protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy by us and our suppliers who process personal information on our behalf.

**9.2** Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee

the security of your personal information transmitted through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

#### **10. Our Policies Concerning Children**

Our Services and websites are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. Children under 13 should not use our websites or games at any time. If we learn we have inadvertently collected or received personal information from a child under 13, we will take reasonable measures to promptly remove that information from our records. If you believe we might have any information from or about a child under 13, please contact us at [info@game-garden.com](mailto:info@game-garden.com).

#### **11. Changes to this Policy**

**11.1** From time to time, we may change and update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions of this Privacy Policy in our documentation archive. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes in our practices.

**11.2** Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

#### **12. Contact Us**

**12.1** If you have any questions, please send your inquiries to Service support at [info@game-garden.com](mailto:info@game-garden.com). So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within period established by applicable law.

**12.2** All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.