

Privacy Policy

Last modified: February 14, 2016

1. Introduction

Startek Invest Limited develops and publishes games for mobile devices and social networks under the name Game Garden. “**Game Garden,**” or “**we**” or “**us**” refers to Startek Invest Limited. Game Garden respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy applies whenever you play our games or otherwise access any of our other products, services, content, game-garden.com and/or other domains provided by Game Garden, together referred to as “**Services.**” This Privacy Policy describes:

what types of information we may collect or that you may provide;

how we process, store, and use the information and with whom we share it;

how you can access and update that information;

the choices you can make about how we collect, use, and share your information;

how we protect the information we store about you.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices and do not want Game Garden to collect, store, use, or share your information in the ways described, you should not play Game Garden’s games or use other Game Garden’s Services.

By accessing and/or using our Services, you consent to us collecting, processing, storing and sharing your personal information in the ways described in 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 End User License Agreement relating to our Services, you must be at least 13 years old to access and/or use our Services.

2. About Us

We are a company called Startek Invest Limited registered in Cyprus. Our registered office is Klimentos 41-43, Klimentos Tower, Office 25, Nicosia, Cyprus, P.C. 1061. We develop and distribute our games throughout the world in cooperation with other companies operating pursuant to a contract with Game Garden.

3. Information We Collect and How We Collect It

Automatic Information Collection And Tracking

When you download, access and/or use the Services, we may use technology to automatically collect:

Usage Details. When you access and use the games and Services we may automatically collect certain details of your access to and use of the Services.

Device Information. We may collect information about your mobile device and internet connection, including the following:

- device’s unique device identifier;
- IP addresses;
- the type of computer or mobile device you are using;

- your operating system version;
- your mobile device's identifiers, like your MAC Address, Identifier For Advertising (IDFA), and/or International Mobile Equipment Identity (IMEI);
- your browser types;
- your browser language;
- referring and exit pages, and URLs;
- platform type.

Stored Information and Files. The Services also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts and address book information.

Other Information from Your Mobile Device. If you play Game Garden games on your mobile device, in addition to your device identifiers, we may also collect:

- the name you have associated with your device;
- your telephone number;
- your country; and
- information about Game Garden and other third-party apps you have on your device.

By accessing and/or using our Services, you consent to our use of automated information collection technologies in accordance with this Privacy Policy. If you do not wish us to collect data as described in this Section, you should stop using our Services.

Information about You That We Get From Social Networks

- If you play Game Garden's games or access any of our other Services on a social network like Facebook, Game Garden receives certain information about you from the social network automatically. The information we receive depends on the Game Garden game you are playing, the social network, and your privacy settings and your friends' privacy settings on that social network.
- For example, Game Garden may collect and store some or all of the following information provided by the social network:
 - Your first and last name;
 - your profile picture or its URL;
 - your social network ID number (like your Facebook ID number), which is linked to publicly-available information like your name and profile photo;
 - the social network ID numbers and other public data for your friends;
 - the login e-mail you provided to that social network when you registered with it;
 - your physical location and that of the devices you use to access our Services;
 - your gender;
 - your birthday and/or age range;
 - your interactions with us on our social media channels; such as Facebook
 - other publicly-available information on the social network; and/or
 - any other information that you or the social networks share with Game Garden.
- If you access our Services from a social network, you should also read that social network's

Terms of Service and Privacy Policy.

- If you are unclear about what information a social network is sharing with us, please go to the social networks where you play our games to find out more about their privacy settings.

Information You Provide to Us

When you download our games or use our Services, we may ask you provide certain types of personally identifying and non-personal information. This may include:

Information you provide to us when you enter a contest or promotion sponsored by us, and when you report a problem with the Services.

Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us.

Details of transactions you carry out through the Services and of the fulfillment of your orders.

Payment Information

If you purchase a license to use in-game virtual currency or virtual items in a game you play on a social network or that you downloaded on your mobile device, Game Garden does not receive or store any billing and payment information that you provide when your purchase is processed by a mobile app store (like Apple or Google) or by the social network (like Facebook). Our End-User License Agreement explains our policies and terms relevant to our charges, billing practices, third party credits and virtual currencies. Please note that purchases of third-party credits or currencies may also be subject to those parties' policies.

Customer Support Correspondence

When you ask for help from our Customer Support team, we will collect and store the contact information you give them (generally, your name and e-mail address), information about your game play and activity on our Services, and your Game Garden player and/or social network ID number. We will also store all communications you have with the Customer Service team and any information in those communications in order to provide support.

4. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

operate, improve and optimize our Services and our players' experiences;

provide technical support and respond to players' inquiries;

protect Game Garden's rights and property in connection with the Services and enforce the terms of our End User License Agreement;

notify you when in-game updates, new products or promotions become available;

comply with our legal obligations, resolve any disputes we may have with you or other players, and enforce our rights arising from any contracts entered into between you and us, including for billing and collection, or between us and third parties;

conduct research; and

fulfill any other purpose for which you provide it.

The usage information we collect helps us to improve our Services and to deliver a better and more personalized experience by enabling us to:

Estimate our audience size and usage patterns.

Store information about your preferences, allowing us to customize our Services according to your individual interests.

Recognize you when you use the Services.

5. Disclosure of Your Information

We may disclose or publish aggregated information about our users (information about you and other players collectively that is not intended to specifically identify you) and other non-personal information about our players for industry analysis, demographic profiling, marketing, analytics, and advertising and other business purposes.

In addition, we may disclose personal information that we collect or you provide:

To our subsidiaries and affiliates, contractors, service providers and other third parties we use to support our business. We contractually require these third parties to maintain the confidentiality of the information we share with them, and we contractually require them not to use your information for anything other than to provide services on our behalf.

To fulfill the purpose for which you provide it.

For any other purpose disclosed by us when you provide the information.

To facilitate your interactions with your friends on social networks. If you play through a social network, your social network friends will see your name, profile photo and descriptions of your game activity.

With your consent.

To provide you with Offer Walls. Game Garden 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 players 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 Game Garden. 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.

To comply with any court order, law or legal process, including responding to any government or regulatory request.

To enforce our rights arising from any contracts entered into between you and us, including the Services EULA and for billing and collection.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Game Garden, our customers, or others.

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Game Garden’s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Game Garden about our players is among the assets transferred.

6. Your Choices about Our Collection, Use and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

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.

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.

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.”

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. Please note that certain records, for example those related to customer service matters, will be held for legal and accounting purposes.

7. 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.

8. International Operations and Transfers of Information

IMPORTANT: when you use our services, your data may be sent to the Germany or Netherlands and possibly other countries.

As part of our international operations we may transfer data from time to time for our legitimate business purposes.

We store information about players and users on servers located in Germany and Netherlands, and we may also store this information on servers and equipment in other countries. The data we hold may also be processed by employees who work for us or for one of our vendors. This staff may be engaged in, among other things, (i) the processing of transactions and (ii) the provision of support services. When we transfer your information internationally, we will take reasonable steps to ensure that your personal information is treated securely, lawfully, and in the manner we describe here. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to the places where your information is transferred to or stored may be different from the privacy laws applicable in the country where you reside.

9. Data Security

We have implemented appropriate measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure, and we are committed to the protection of customer information. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

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. Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page. 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.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

11. Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: info@game-garden.com