

PRIVACY & DATA POLICY

ISSUED BY BULKHEAD INTERACTIVE LIMITED

for

"BATTALION 1944"

Last Updated: 17 May 2019

1. INTRODUCTION AND GENERAL TERMS

We are Bulkhead Interactive Limited; the developers behind the game, *Battalion 1944*. We are a company incorporated in England under company number 09877574, and our registered address is at Laurie House, Colyear Street, Derby, United Kingdom, DE1 1LA ("**Bulkhead**", "**we**", "**us**", "**our**").

This privacy and data policy ("**Privacy Policy**") applies and has effect in respect of our game, *Battalion 1944* (the "**Game**"), and all related online services (including online network play connectivity and interactivity) made available by us (the "**Online Service**").

If you have any questions or comments about this Privacy Policy, please contact us at privacy@bulkheadinteractive.com.

We are committed to respecting your privacy and complying with laws and regulations to ensure that the personal information you give us is kept secure and processed fairly.

The Privacy Policy explains the basis on which personal information we collect from you will be processed by us within the scope of this Privacy Policy. Where we decide the purpose or means for which personal data you supply through these Online Services is processed, we are the "data controller." We will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679.

Please read this Privacy Policy carefully as it contains important information about the following:

- What information we may collect about you;
- How we will use information we collect about you;
- Whether we will disclose your details to anyone else; and
- Your choices and rights regarding the personal information you have provided to us.

This Privacy Policy should be read in conjunction with our terms of use for the Game, which [you can find here](#).

The Online Service may contain hyperlinks to services owned and operated by third parties. The linked services operate fully independent from us and have separate and independent privacy policies that we encourage you to review when you visit those sites. They will govern the use of personal information that you submit or which is collected by cookies and other tracking technologies whilst using these services. We do not accept any responsibility or liability for the privacy practices of such third party services and your use of these is at your own risk.

We may make changes to this Privacy Policy in future, which will be posted on this page. You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes through the Games.

2. INFORMATION WE MAY COLLECT ABOUT YOU

We collect and process the following information, which may include your personal data.

Information provided by you when playing the Game

("Basic Information")

We will collect the following information from you when you play the Game.

This may include:

- *Steam* ID
- *Steam* display name
- details on the your location (including country, city and coordinates)
- your IP Address.

We work with **PlayFab** (a third party service provider) who may collect Basic Information on our behalf and in accordance with our instructions and their applicable privacy notice.

You can find out more about the way PlayFab collects and processes this information by following the links to the privacy notice and/or terms and conditions set out below:

- **PlayFab:**
 - <https://privacy.microsoft.com/en-us/privacystatement>; and
 - <https://blog.playfab.com/blog/gdpr>.

We also work with **FACEIT** (Face It Limited) who may collect your *Steam* ID and other Basic Information on our behalf and in accordance with our instructions and their applicable privacy notice.

You can find out more about the way FACEIT collects and processes this information by

following the link to the privacy notice set out below:

- **FACEIT:** <https://corporate.faceit.com/privacy>

Contact information provided by you when you contact us

("Contact Information")

We may ask you for, or you may submit, certain contact information to us whenever you contact us via privacy@bulkheadinteractive.com or support@bulkheadinteractive.com.

This may include:

- your email address; and
- your name.

How you play the Game and use the Online Services

("Analytics")

We may collect technical information about your use of the Game and/or Online Services through the use of tracking technologies and analytics.

Personal data we may collect includes the following:

- your *Steam* ID
- your *Steam* display name and the display names of your Steam friends who also play the Game
- details on your location (including country, city and coordinates)
- dates of logins to the Game
- game play results (e.g. wins/losses, kills/deaths)
- game play progress
- game play time
- user interface usage (e.g. buttons clicked, screens viewed)
- hardware information (e.g. CPU, RAM, video card configuration)
- any purchases you have made in the Game
- identification of crashes and bugs.

We use the following third party service providers when conducting our analysis:

- **PlayFab:**
 - <https://privacy.microsoft.com/en-us/privacystatement>; and
 - <https://blog.playfab.com/blog/gdpr>
- **Vivox:**
 - <https://www.vivox.com/policies/gdpr.html>
- **Easy Anti-Cheat:**
 - https://support.easyanticheat.net/static/downloads/eula/EasyAntiCheat_Privacy_statement_161219.pdf
- **FACEIT:**
 - <https://corporate.faceit.com/privacy>

These third party service providers may collect Analytics on our behalf and in accordance with our instructions and their applicable privacy notice.

You can find out more about the way they collect and process this information by following the above links to the privacy notice and/or terms and conditions for each applicable third party analytics provider.

3. WHY WE COLLECT AND USE YOUR PERSONAL INFORMATION

We may collect and use your personal information for the following purposes:

To provide the Game and the Online Services to you

We will use information about you (including Basic Information and Analytics) for delivering the Game to you under the terms of use agreed between us. The processing of information in this way is necessary for us to record your progress and current status within the Game, and to ensure the Game delivers the features promised and function properly, so that you have the best experience when playing the Game and using the Online Services.

To help us improve the Game and Online Services, and to fix any problems

We may process Basic Information and Analytics about you so that we can analyse and improve the Game and Online Services.

This processing is also necessary for us to pursue our legitimate interests of: (i)

ensuring that our Online Services function properly so that you and other users have the best experience when playing our Game and using the Online Service; (ii) improving the quality of our Online Services, and providing a better experience to our users; and (iii) identifying and correcting any bugs in the Game and Online Service.

To respond to your enquiries and requests for support

We may process Contact Information so that we are able to properly respond to your enquiries and support requests either via privacy@bulkheadinteractive.com or support@bulkheadinteractive.com, and so that you are able to play the Game and/or use the Online Service in accordance with the terms of use agreed between us.

You are under no obligation to provide us with any details, but if you don't provide all relevant information we may not be able to help with your enquiry or support request.

To Prevent Cheating, Fraud and Illegal Activity

We process personal data, including anti-cheat logs, for the legitimate interests of ensuring that use of the Game and the Online Service is lawful and non-fraudulent, does not disrupt the operation of our services, does not harass our staff or other individuals, and to enforce our legal rights and comply with our legal obligations.

Where we reasonably believe that you are or may be in breach of any of the applicable laws, we may use your personal information to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

We process anti-cheat logs for our legitimate interest of preventing cheating by players playing the Game and ensuring that any use of the Game is lawful and non-fraudulent.

We work with Steam (Valve Corporation) to assist us with fraud prevention and the detection of any illegal activity (e.g. to verify in-Game purchases made through Steam). We also implement anti-cheat measures to detect cheating, and work with Easy-Anti-Cheat (operated by Kamu Ltd.) to do this. Please see the section on "automated decision making" for more information on this.

4. AUTOMATED DECISION MAKING

PLEASE NOTE: We use automated decision-making methods which do not involve human involvement to process your information only in the ways that are described in this Privacy Policy.

We process your personal information via automated decision making methods in order to identify users who are cheating in the Games. Our automated decision making methods are

designed to detect cheating by looking out for irregularities in game play behaviour. We also work with Easy-Anti-Cheat (operated by Kamu Ltd.) to detect cheating.

If users are determined to be or suspected of cheating or acting in violation of our terms of use for the Game, the following actions may be taken:

- indefinite suspension from playing the Game, although they will still have access to their Game account; and
- anything acquired relating to the Game, be it through credits or real-money purchase, will be lost.

In this scenario, the user will be informed of the outcome and will have the right to obtain human intervention to express his or her point of view and to contest the decision to block access to the Game. If this applies to you, please contact us at support@bulkheadinteractive.com.

You can find more information on data processing activities in respect of which Easy-Anti-Cheat is acting as data controller in the Easy Anti-Cheat privacy policy here: https://support.easyanticheat.net/static/downloads/eula/EasyAntiCheat_Privacy_statement_161219.pdf.

5. WHO WE SHARE YOUR INFORMATION WITH

We will share your information with third parties only in the ways that are described in this Privacy Policy.

Third Parties: As reasonably necessary for the purposes set out in this privacy policy, we may share your personal information with carefully-selected third parties (including suppliers and subcontractors), who are engaged to help us run, manage and improve the quality of the Online Services that we offer, as well as for marketing and fraud prevention purposes and to protect and defend our rights and property.

Third party service providers which carry specific activities include: (i) *Steam* (Valve Corporation) for payment processing; (ii) *Vivox* (Mercer Road Corporation) for providing in-game communication; (iii) *Playfab Inc.* for managing purchases, logins and players; and (iv) *Face It Limited (FACEIT)* for providing a competitive gaming platform for the Game.

We only provide these companies with the information which they need to carry out their services for specified purposes and in accordance with our instructions, and they will not be permitted to use the information for other purposes. We require all third parties to treat your personal information as carefully and confidentially as we do and to take appropriate security measures to protect your personal information in line with our policies.

Group members, personnel, suppliers or subcontractors: We keep your information confidential, but may disclose it to any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006), our personnel, suppliers or subcontractors insofar as it is reasonably

necessary for the purposes set out in this Privacy Policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard it.

Merger or acquisition: If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Required by law: We may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies) in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Except as set out above, we will never sell, distribute or disclose any of your personal data to any third party without your express consent.

6. SECURITY

We will take all steps reasonably necessary, including all reasonable technical and organisational precautions such as encryption and password protection of your data, to ensure that your personal data is treated securely and in accordance with this Privacy Policy.

Please be aware that, while we make the security of your personal information a high priority and we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all security breaches.

7. INTERNATIONAL DATA TRANSFERS

It is possible that your personal information may be transferred outside of the EEA by third parties referred to in the policies as being the recipients of your data. We recommend that you refer to the privacy policies and/or terms and conditions of these third parties if you are concerned about your data being transferred outside the EEA.

We store your personal information only within the EEA. Your personal information may be transferred outside of the EU by Steam (i.e. Valve Corporation), PlayFab, Vivox, Easy Anti-Cheat (Kamu Ltd) or FACEIT.

Where we transfer your information outside of the EEA, we have agreements in place with those parties which include standard data protection clauses adopted by a data protection regulator and approved by the European Commission to ensure that appropriate safeguards are in place to protect your personal data. For further information about these safeguards you can contact us at privacy@bulkheadinteractive.com.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you want us to delete any personal information that we hold about you for any reason you can ask us to do so by contacting us via privacy@bulkheadinteractive.com. Please note that where you have purchased in-game items or perks you may no longer have access to these if you ask us to delete your personal information (this will be the case even where you have paid for these items or perks).

Vivox, one of our third party service provider, only retains personal data that it collects from you for 30 days.

9. CHILDREN'S PRIVACY

We do not knowingly solicit data from or market to children under the age of 13. Our terms of use prohibit users aged under 13 years from playing the Game and accessing the Online Service. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at privacy@bulkheadinteractive.com. We will delete any personal information that relates to children under the age of 13, if we become aware of such information, within a reasonable time.

10. YOUR RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay in response and within one month at the latest from the date of a request made by you. You have the right to:

- request a copy of personal data we are processing about you and have inaccuracies corrected. We will use reasonable efforts to the extent required by law to supply, correct or delete personal information held about you on our files (and with any third parties to whom it has been disclosed to);
- request us to restrict or stop our processing, or to delete your personal data. You can delete your Game account by following the instructions in your account settings;
- request a machine readable copy of your personal data, which you can use with another service provider. If you request, we will supply you with the relevant personal data in a commonly used, machine-readable and interoperable format.

Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and

- make a complaint to a data protection regulator. If you are unhappy with the way we are processing your personal data, please let us know by contacting us via privacy@bulkheadinteractive.com before making taking other steps.

Please send your requests to privacy@bulkheadinteractive.com. Please note that we may require you to verify your identity before allowing you to access your personal information.

CONTACT INFORMATION

All questions, comments or enquiries should be directed to us at privacy@bulkheadinteractive.com. We will endeavour to respond to any query or questions within reasonable time.

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