

Privacy Policy

Effective Date: 26 May 2025

Last Updated: 26 May 2025

1. Who We Are

Transcendence (“we”, “our”, “us”) operates a web platform offering simple games (e.g., Pong, Snek), accessible via user accounts.

Data Controller:

Transcendence Email: example@gmail.com

Website: <https://Transcendence>

We are responsible for the collection and processing of your personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable privacy laws.

2. Contact for Data Protection Queries

If you have questions about how we process your data, or wish to exercise your rights under GDPR, please contact: Data Protection Officer (DPO) (if applicable): Not currently appointed, as per Article 37 GDPR exemption criteria.

Email: example@gmail.com

3. What Personal Data We Collect

We may collect the following personal data:

- Username
- Alias / Display Name
- Email Address
- Encrypted Password

IP Address Login timestamps and session data When you sign in using third-party providers (e.g., Google, Intra), we only receive the minimal data necessary for authentication (e.g., your email and username). We do not collect sensitive data (special categories under Article 9 GDPR) such as health, political views, religious beliefs, etc.

4. Why We Collect and Process Your Data

We collect your data to: Register and manage your account Authenticate your identity during login Enable access to personalized game features Maintain the security and integrity of our service Comply with legal obligations

5. Legal Basis for Processing

Our processing is based on: Performance of a contract (Art. 6(1)(b) GDPR) – e.g., to register and authenticate your account. Legal obligations (Art. 6(1)(c)) – if required to retain or disclose information. Legitimate interests (Art. 6(1)(f)) – for fraud prevention and platform security, provided your rights do not override our interests. Consent (Art. 6(1)(a)) – where applicable, such as optional email notifications.

6. Children’s Data

Our services are not intended for children under the age of 18. We do not knowingly collect data from children without verifiable parental consent, where required by law.

7. How We Store and Protect Your Data

Passwords are hashed using industry-standard encryption techniques Servers are hosted in the EU or in jurisdictions with adequate protection (per EU Commission decisions) We use firewalls,

access control, and TLS encryption We apply data minimization and pseudonymization principles by default

8. International Data Transfers

If data is transferred outside the EU/EEA: We ensure an adequacy decision is in place Or we apply Standard Contractual Clauses (SCCs) or other appropriate safeguards You may request a copy of these measures via email

9. Automated Decision-Making

We do not make decisions based solely on automated processing that significantly affect you. If we introduce such functionality in the future: You will be informed You may request human review, express your point of view, or contest the decision

10. Data Retention

We retain personal data only for as long as necessary to: Maintain your account Fulfill contractual obligations Comply with applicable laws If you delete your account, we will erase all associated data within 24 hours, unless longer retention is legally required.

11. Sharing of Personal Data

We do not sell or rent your data. We only share it in the following situations: With third-party login/authentication providers (e.g., Google, Intra) If required by law, court order, or to protect our legal rights With service providers under strict data processing agreements (Art. 28 GDPR)

12. Your Rights Under GDPR

You have the right to:

- Access your data (Art. 15)
- Rectify inaccurate/incomplete data (Art. 16)
- Erasure (“Right to be forgotten”) (Art. 17)
- Restrict processing (Art. 18)
- Object to processing (Art. 21)
- Withdraw consent at any time (Art. 7)
- Data portability (Art. 20)
- Lodge a complaint with a supervisory authority (Art. 77)

To exercise these rights, contact: example@gmail.com We will respond within one month, extendable by two months for complex cases.

13. Cookies and Tracking

We only use strictly necessary cookies for session management. No analytics or tracking cookies are used without consent.

14. Data Breaches

In the event of a personal data breach that poses a risk to your rights and freedoms: We will notify the relevant Data Protection Authority within 72 hours If the risk is high, we will notify you directly without undue delay

15. Data Processing Records and Impact

Assessments Where applicable, we maintain internal records of processing activities. If new processing presents a high risk, a Data Protection Impact Assessment (DPIA) will be conducted as required by Art. 35 GDPR.

16. Data Protection by Design and Default

We apply privacy-by-design principles, ensuring that only the minimum necessary data is collected, and default settings are privacy-focused.

17. Changes to This Policy

We may update this policy to reflect legal or operational changes. Updates will be posted here with a revised “Last Updated” date. We encourage you to review this page regularly.

18. Contact Us

If you have questions about this Privacy Policy or how we handle your data, contact us at:

Email: example@gmail.com

Website: <https://Transcendence>