

## PRIVACY POLICY

### Games United Yazılım Eğitim Sanayi Ticaret A.Ş.

#### A. DATA CONTROLLER:

GAMES UNITED YAZILIM EĞİTİM SANAYİ TİCARET A.Ş

E-mail Address : [privacy@gamesunited.co](mailto:privacy@gamesunited.co)

Address : Esentepe Mahallesi Yüzbaşı Kaya Aldoğan Sokak Pardus Plaza Blok No: 4 İç Kapı No: 4 Şişli / İstanbul/Türkiye

This privacy and data policy ("**Privacy Policy**") applies and has effect in respect of all games, related online services (*including online network play connectivity and interactivity*) and other software and products made available by Games United. Together the mobile app/Game(s) and the Website are referred to as the "**Online Services**".

As Games United, we are committed to protecting and respecting your privacy. The Privacy Policy explains the basis on which personal information we collect from you will be processed by us or on our behalf. Where we decide the purpose or means for which personal data you supply through these Online Services is processed, we are the "controller".

The Online Services may contain hyperlinks to services owned and operated by third parties. These third-party services may have their own privacy policies and we recommend that you review them. They will govern the use of any 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.

Games United reserves the right to modify this Privacy Policy and your continued use of the Services shall mean your acceptance of the changes to this Privacy Policy. 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 Online Services.

#### B. THE PURPOSE, SCOPE AND LEGAL BASIS OF PROCESSING

This Privacy Policy is incorporated by reference into the Games United Terms of Service (the "Terms of Services"). The terms "Games United," "we," and "us" include GAMES UNITED YAZILIM EĞİTİM SANAYİ TİCARET A.Ş. This Privacy Policy explains our online and offline information practices, the kinds of information we may collect, how we intend to use, store, protect, disclose and share that information, and how you can opt out of a use or correct or change such information.

This Privacy Policy applies to Personal Information that is Processed by Games United in the course of our business, including on Games United websites, mobile applications, forums, blogs, and other online or offline offerings (together with any and all future online and offline offerings operated by or on behalf of Games United. All individuals whose responsibilities include the Processing of Personal Information on behalf of Games United are expected to protect that data by adhering to this Privacy Policy.

This Privacy Policy is intended to meet requirements globally, including those in North America, Europe, Türkiye, MENA, APAC and other jurisdictions.

By visiting, installing, using or otherwise accessing the Services, you agree to this Privacy Policy and Terms of Services of Games United and give an explicit and informed consent to the processing of your Personal Information in accordance with this Privacy Policy.

Please do not install or use the Services if you do not agree to this Privacy Policy or Terms of Services. PLEASE NOTE THAT GAMES UNITED IS NOT RESPONSIBLE FOR THE ACTIONS OF THIRD PARTIES, THE CONTENT OF THEIR SITES, THE USE OF INFORMATION YOU PROVIDE TO THEM OR ANY SERVICES THEY MAY OFFER.

The types of Personal Information we may collect (directly from you or from Third-party sources) and our privacy practices depend on the nature of the relationship you have with Games United and the requirements of applicable law. Some of the ways that Games United may collect Personal Information include:

- you may provide Personal Information directly to Games United through interacting with the Services, participate in Services feedback, questionnaires, surveys, or contests or participating in forums discussions, and requesting Services, or information; and
- as you navigate the Services, certain passive information may also be collected about your visit, including through Cookies and similar technologies as described below.

Primary goals in collecting information are to provide and improve our Services, to administer your use of the Services and to enable you to enjoy and easily navigate our Services. We endeavour to collect only that information that is relevant for the purposes of Processing. Below are the ways we collect Personal Information and how we use it.

Games United collects Personal Information regarding its current, prospective, and former clients, customers, users, visitors, and guests. We use information to operate the Services, including:

- To administer your account and provide the Online Services to you,
- To inform you about offers and events,
- To communicate with you by email, phone, social media or mobile device about products or services that we think may interest you,
- To improve the Services and develop new ones,
- To fix bugs and malfunctions to provide sustainability of the Services,
- To prevent, detect and fight fraud or other illegal or unauthorized activities,
- To ensure legal compliance and take action against fraudulent or misbehaving players,
- To verify and confirm payments,
- To update and develop player profiles,
- To develop and improve the Online Services and player experience,
- To provide social features as part of the service,
- To customize your service experience,
- To respond to your comments and questions and provide player support,

- To enable you to communicate with other players and
  - To process your information as described in this Privacy Policy, we rely on the following legal bases:
    - o **Legitimate interests:** We may use your information where we have legitimate interests to do so. For example, we analyse our users' behaviour to improve the Services, to prevent and detect fraud and misuse, and to marketing processes to you.
    - o **Consent:** With your consent, we can track your user data to provide personalized content and ads. You can opt-out targeted advertising or receive personalized notifications by changing the Privacy settings on your device. By opting out of targeted advertising, your Advertiser ID cannot be shared. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
    - o **Performance of a Contract**
    - o **Compliance with a Legal Obligation**
- You may contact us at [privacy@gamesunited.co](mailto:privacy@gamesunited.co) for more information regarding legitimate interests.

## C. THE COLLECTION METHODS OF DATA

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or providing other information via our e-mail address or Google documents.
- **Automated technologies or interactions.** As you use our Online Services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please refer to the Cookies section in this policy for further details.
- **Technical Data Regarding Bugs and Malfunctions.** We also automatically collect data regarding bug sand malfunctions you may encountered while you using the Services to fix bugs and malfunctions. Screenshots might be taken automatically when a bug or malfunction occurs during your use of the Services. For the avoidance of doubt, screenshot will only contain the rendered image of the game so that it will not contain your entire screen. The screenshots and the error codes will be sent to us via e-mail automatically and will be kept 15 days on Google Mail Services and will be deleted after 15 days.
- **Third parties or publicly available sources.** We may receive personal data about you from third parties as set out below:
  - o **Technical Data from the following parties:** We may receive personal data about you via Analytics providers (Microsoft Azure PlayFab or similar);
  - o **Ad Networks:** Games United may feature advertising within the Services. The advertisers may collect and use information about you.
  - o **Information Submitted Via Services**
  - o **Social Media Pages**

## D. TRANSFERS OF PERSONEL DATA

- **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), 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 safe guard it.
- **Merger or acquisition:** If we are involved in a merger, acquisition, or sale of all or a portion of its assets, any third party to which we sell or transfer our assets to will have the right to continue to use the personal and other information that you provide us in the manner set out in this Privacy Policy.
- **Required by law:** In addition, we may disclose your personal data 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).
- **Enforcement:** We may also disclose your personal data to third parties in order to enforce or apply the Terms of Use of Games United, to investigate potential breaches, or to protect the rights, property or safety of Games United, our customers, or others.
- **Service providers:** We may also disclose your personal data with service providers that operate on our behalf to help support the Online Services in accordance with our instructions (for example, cloud storage providers, payment processors, or analysing and advertising partners). We store your personal data on Cloud such as Microsoft Azure, Google and AWS.
- **International Transfer:** All Personal Information collected via or by Games United may be stored anywhere in the world, including, but not limited to, in Türkiye, the United States, the European Union, in the cloud, on our servers and on the servers of our affiliates or the servers of our Service Providers. When we transfer your Personal Information internationally, we will take reasonable steps to ensure that it is treated securely, lawfully and in the manner, we describe here. Please note that laws vary from jurisdiction to jurisdiction, so the privacy laws applicable to the places where your information is transferred to or stored, used or processed in may be different from the privacy laws applicable to the place where you are resident. By providing information to Games United, you consent to the storage of your Personal Information in these locations. If you are using our Services from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to Türkiye and the United States and to Processing of your data globally. By choosing to visit the Site, utilize the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of Türkiye and the adjudication of any disputes arising in connection with Games United or the Site will be in accordance with the Terms Services.

We take steps to ensure adequate safeguards are in place to protect your personal data during data transfers.

#### **E. CHILDREN'S INFORMATION**

Games United does not address anyone under the legal age of the country and the age determined by the Apple AppStore, Google PlayStore, Amazon App Store or on Facebook, Microsoft and any related services. We do not knowingly collect personally identifiable information from those under that age limit. If we determine that you have provided personal information to us, we will delete it from our servers immediately. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us [privacy@gamesunited.co](mailto:privacy@gamesunited.co). So that we will be able to do necessary actions.

#### **F. RETAINTION PERIOD**

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using the Websites);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable; and considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

#### **G. RIGHTS OF DATA SUBJECTS**

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access:** You have the right to request copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification:** You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- **The right to erasure:** You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing:** You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing:** You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability:** You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

#### **H. HOW TO EXERCISE THESE RIGHTS**

Any requests to exercise data subjects' rights can be directed to the data controller through the contact details provided in this document. These requests will be addressed by the data controller as early as possible and always within thirty (30) days.