1. Privacy Notice

*Last updated: November 2024*

This Privacy Notice (the “**Notice**”) explains how we, PlayerUnknown Productions B.V. (""**we**"), collect and use your personal data when providing and maintaining our game “PROLOGUE: Go Wayback!” (“**PROLOGUE**”) and certain online features, online user experience connectivity and interactivity and other features relating to PROLOGUE, to allow you to test, experience and in the future create and connect with others. In this Notice, PROLOGUE and all of its features and services are collectively referred to as the “**Services**”. This Notice also informs you about how we protect your personal data and the rights and options you have to control your data.

This Notice will give you information about:

[What personal data we collect](#_What_personal_data)

[Why we process your personal data](#_Why_we_process)

[Children’s data](#_Children’s_data)

[With which parties we share personal data](#_With_which_third)

[Cookies](#_Cookies)

[How we transfer personal data internationally](#_How_we_transfer)

[How we protect and store personal data](#_How_we_protect)

[How to exercise your rights](#_How_to_exercise)

[Interoperability with other services or websites](#_Interoperability_with_other)

[Contact details](#_Contact_details)

[Additional U.S. state disclosures](#_Additional_U.S._state)

We advise you to read this Notice carefully and to consult it on a regular basis when you use our Services, as it may be necessary for us to amend this Notice from time to time. If we want to make substantive changes to the way we process personal data, for example if we want to collect new types of personal data or process personal data for new purposes, we will take reasonable steps to inform you in advance.

Please note that this Notice specifically applies to PROLOGUE only. If you want to learn more about how we collect and process personal data on our corporate website(s), please refer to the Privacy Notice as can be found on <https://playerunknownproductions.net/privacy>.

# What personal data we collect

When we talk about data or personal data in this Notice, we refer to all data that can be directly or indirectly traced back to you as an individual. Depending on how you use our Services, we collect and process data that you ask us to process or data that we otherwise collect. The categories of data we process are:

**Steam Account Data** – which consists of data you provide to Steam and which we automatically collect when you use our Services through Steam:

* Steam ID
* Steam Display Name
* Device ID and Developer ID where applicable
* IP address
* Entitlement data (Steam data to verify you are entitled to additional content)
* Logging and recovery data related to log in attempts and failures, and account suspensions and blocks
* Data you voluntarily provide, including your (business) address, (business) phone number and gender

**Experience Data** – which consists of data we automatically collect throughout your use of our Services and during session:

* Statistical data based on your actions within PROLOGUE, depending on your actions this can include statistical data related to your in-app location, waypoint and postcard created by you.
* IP address
* Device type
* Logging and recovery data, as well as any other data you may voluntarily provide, such as map spawning (location) data and in-app location)

**Technical Data** – which consists of data we automatically collect throughout your use of our Services:

* Device and network connection information, including access logs, device type and settings, system language, operating system, and other information provided by your system, the use you make of our Services and how you interact with it
* Analytical data related to PROLOGUE, including the time it takes for the app to load, app performance, user coordinates within the app, and user behavior data
* Logging Information, including log in attempts, error messages, IP address, and troubleshooting data

**Note:** Some of this Technical Data is collected through Third Parties (such as Steam) and their use of cookies, pixels and other technologies (“**Cookies**”), for more information on Cookies please see **section 5.**

# Why we process your personal data

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| **Purpose of processing** | **Categories of personal data** | **Corresponding legal basis** |
| Providing you with our Services | Steam Account Data | This is necessary for us to fulfill our contract with you when you if you wish to access our Services through Steam. |
| Developing and improving our Services | Steam Account Data  Technical Data  Experience Data | It is our legitimate business interest to develop and improve the delivery of our Services (including by understanding how you use the Services) and to develop new services or products |
| To improve experience and your in-app experiences | Steam Account Data  Technical Data  Experience Data | It is our legitimate business interest to develop and improve our Services and user experience |

# Children’s data

Our Services are currently only available to you if you have an active Steam account and if you are aged 13 or older. We do not knowingly collect or process personal data within our Services from minors aged below 13. If we learn we have collected or received personal data from anyone under the age of 13, we will delete such data. Please contact us if you believe we might have collected or received data from minors under the age of 13.

# With which third parties we disclose personal data

Where relevant and necessary, we provide personal data to the following third parties:

* Our third-party service providers who support us with providing our Services and conducting our business, including Steam and AWS. This means that your personal data is processed by third party vendors for website and application development, hosting and maintenance, data hosting and cloud (storage) services, backup services, data analysis, information security services, technical infrastructure services, customer support services, and marketing services.
* Other parties with whom you choose to share your personal data with, depending on how you use our Services. For instance, social media platforms or other platforms (such as platforms used for customer support), or our business partners.
* Public authorities, justice and law enforcement, fiscal authorities and other authorities assigned with investigative powers or public authority, to the extent we are legally required or have legitimate interests to do so.
* With professional advisors, investigators, or credit reference agencies to the extent we are legally required or have legitimate interests to establish, exercise or defend our legal rights, or prevent or detect crime and fraud.

# Cookies

Our Services are currently only available through Steam. Steam may use Cookies to store and access data on your device to help its websites and apps work. Please refer to Steam’s Cookie Policy for an up-to-date overview of the use of these Cookies on your device(s).

# How we transfer personal data internationally

We try to process your data within the EU as much as possible. Sometimes it is necessary to transfer your data outside the EU to a country which does not provide the same level of data protection as is provided in the EU, for example, if a third-party service provider is located outside Europe. When we transfer your data outside the EU, we ensure that this is done in accordance with applicable data protection laws and that the protection of your data is adequately safeguarded. We do this, for example, by concluding agreements with third party service providers based on the EU standard contractual clauses for the international transfer of personal data. If you would like to receive more information on the safeguards taken, please contact us via [privacy@pp.studio](mailto:privacy@pp.studio).

# How we protect and store personal data

We have implemented physical, technical and organisational security measures to protect your personal data as required by applicable laws. These measures are aimed at ensuring the integrity and confidentiality of your personal data, for instance by ensuring that only authorised employees have access to your personal data, and to protect it against unlawful or unauthorized destruction, loss, alteration, use or disclosure, or access. We evaluate and update these measures on a regular basis. Please be aware that no information system can be 100% secure. This means that we cannot guarantee the absolute security or availability of your personal data.

We will retain your personal data for the duration of your interaction with our Services, unless a shorter retention period is required by applicable laws or the data is no longer necessary for the purposes for which the data was obtained. Once you no longer interact with our Services, we will retain your personal data for the period of time that enables us to:

* fulfil our legal obligations, including legal retention periods;
* initiate, investigate or defend against legal claims;
* address your questions, requests or complaints; and
* keep our records for analysis and audit purposes.

# How to exercise your rights

We respect the rights granted to you under applicable data protection laws. Depending on your location and such applicable laws, these may include the right to access your personal data that we hold about you, to rectify or erase certain personal data, to restrict processing of your personal data and to get an electronic copy of your personal data for purposes of transmitting it to another company. These rights may be subject to certain limitations or restrictions as allowed or imposed by applicable laws, if this is the case we will let you know in our communications with you.

In addition, where we rely on our legitimate interest to process your personal data, you have the right to object to such processing, wholly or partly, on grounds related to your particular situation and in accordance with the laws applicable to you. For instance, depending on your country this may include a right to opt-out to marketing communications via an opt-out link in the respective marketing message.

Where we rely on your consent to process your personal data, you have the right to withdraw your consent at any time.

To exercise your rights, please send an email to [privacy@pp.studio](mailto:privacy@pp.studio).

You are also entitled to lodge a complaint with your local data protection authority.

# Interoperability with other services or websites

Our Services may operate in connection with third party services or websites, such as Steam. We are not responsible for the way in which these third parties handle your personal data. We advise you to read the privacy notice of the third party when you make use of their service or visit their website in order to understand how this third party collects and uses your personal data.

# Contact details

# PLAYER UNKNOWN PRODUCTIONS B.V.

# Mt. Lincolnweg 38

# 1033SN Amsterdam

The Netherlands

[privacy@pp.studio](mailto:privacy@pp.studio)

# Additional U.S. state disclosures

This section provides information required under various U.S. state privacy laws about how we handle certain personal information we have collected, used, and disclosed and certain rights under applicable state law. These provisions supplement the other sections in this Notice.

* 1. ***Personal Data Collection, Use, Disclosure, and Retention***

The chart below provides additional information about the personal data we collect and disclose. You can read more about the personal data we collect in the *“What personal data we collect”* section above, how we use personal data in the *“Why we process your personal data”* section above, and how we retain personal data in the *“How we protect and store personal data”* section above.

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| **Category** | **Categories of third parties to whom we disclosed personal data for business purposes** |
| Identifiers (e.g., your Steam ID, Steam Display Name, IP address) | Our user experience and analytics database(s), to the extent you have chosen to share this information |
| Internet or other similar network activity (e.g., information about your interaction with our Services) | Our cloud service provider for in-app experience and analytics database(s). |

Certain data collection and processing on our Services may be considered “targeted advertising,” a “sale,” or “sharing” for cross-context behavioral advertising under applicable state law. As defined by California law, we will not sell or share identifiers, internet or similar network or activity data with our third-party marketing partners to provide you with more relevant advertising. We do not “sell” or “share” the personal information of known minors.

Please note that we use and disclose sensitive personal data only for purposes expressly permitted under California law.

* 1. ***Your Privacy Rights***

To the extent provided for by law and subject to applicable exceptions, individuals may have the following rights concerning their personal data:

* The right to know information about our processing of your personal information, including the specific pieces of Personal Information that we have collected from you;
* The right to request deletion of your personal information;
* The right to correct your personal information; and
* The right to opt out of “sales,” “sharing” for cross-contextual behavioral advertising, or targeted advertising; and
* The right to be free from discrimination relating to the exercise of any of your privacy rights.
  1. ***Exercising Your Rights***

You may submit requests to know, delete, or correct by contacting us using the contact information provided above. To exercise your rights, please send an email to [privacy@pp.studio](mailto:privacy@pp.studio). Please include the phrase “Personal Information Privacy Request” in the subject line, and specify the Service you are inquiring about, along with your name, address, and email address. To protect your personal data from unauthorized access, change, or deletion, we will further verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal information subject to the request. We may need to request additional personal information from you to protect against fraudulent or spoofed requests.

**Please consult Steam’s Privacy Notice for information about how Steam processes your personal data, and how to exercise your rights with respect to any personal data Steam may process from you.**

To submit a request to opt out of “sales,” “sharing” for cross-contextual behavioral advertising, or targeted advertising, please opt out of such or use privacy preference signals recognized under applicable local law, such as the Global Privacy Control (GPC), but please note that this signal will be linked to your browser only. For more information on the GPC and how to use a browser or browser extension incorporating the GPC signal, see <https://globalprivacycontrol.org/>.

* 1. ***Authorized Agents***

Authorized agents wishing to exercise rights on behalf of an individual may use the submission method noted above. We will honor a request from an authorized agent provided that (i) the individual provides written authorization to the authorized agent to act on their behalf and we can verify their identity, and (ii) the agent submits proof of authorization.

* 1. ***Appeals***

You may also have a right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please contact us via [privacy@pp.studio](mailto:privacy@pp.studio) and include the phrase “Personal Information Appeal Request” in the subject line.