### RIDDLEBIT PRIVACY POLICY

Last updated on 30.09.2022

This policy applies to your use of the Riddlebit services. By "Riddlebit services," we mean any of our games such as Setback, websites, applications, or other products or services that link to this policy. When we say "Riddlebit" (or similar things like "we" or "us") we're referring to Riddlebit AS (a company registered in Norway with address at Munkegata 58, 7011 Trondheim, Norway) or, where applicable, entities that control and are responsible for your information.

Additional terms and conditions may also apply to your relationship with Riddlebit, depending on how you choose to interact with us. Please read this entire policy to make sure you understand it. You should also be sure to carefully review other terms potentially applicable to your visit and your use of specific Riddlebit services such as Setback, and confirm that you understand and agree to the End User License Agreement in force from time to time, before playing.

Please see "Contact Us" below to learn more about sending us any privacy-related questions or concerns you may have.

## Information We Collect

We generally collect information in three ways: (1) you voluntarily provide information to us, (2) automatically from your use of the Riddlebit services, such as through our games and other software, and (3) from third parties and service providers, such as game platforms.

#### (1) Information You Provide

You may provide your personal information to us when you choose to use the Riddlebit services. Some of the most common examples of situations in which you may provide information to us include:

- Licensing and downloading our games
- Completing a survey
- Signing up for email alerts or subscribing to receive other information from us
- Entering online competitions or registering for or participating in special events

- Entering contests, participating in any of our promotions, or accepting any prizes you
  may win through us
- Chatting to other players using in-game text chat
- Contacting us for any reason, such as by email or through forums, including for technical support or customer service.

The specific types of information you may be able to provide us will often vary depending on the Riddlebit services you are using and how you interact with them. If you are contacting us for support, we may ask for your email address and platform unique ID. Occasionally, we may ask for additional information such as your platform unique ID, phone number or postal address if you have won a competition. We'll also collect information when you choose to share it with us directly in any other way, including by sending it as part of a communication with Riddlebit (like through player support requests) or other users of the Riddlebit services (like through in-game chat or forum posts).

#### (2) Information We Collect Automatically

We collect some information automatically when you interact with the Riddlebit services. We typically aggregate this data and use it in statistical form to determine trends among groups of users, rather than using it to identify individual persons.

We may use technologies like cookies, scripts, log files, web browsers and our back-end servers to collect and store such information. We use the information to modify or improve features, to manage advertising, to address technical issues, to prevent fraud or misuse of our services, and to conduct data analytics. Common examples include:

- Technical information about your computer, device, hardware, or software you use to
  access the Internet or our services, such as IP address or other transactional or
  identifier information for your device (such as device make and model, information about
  device operating systems and browsers, or other device or system related
  specifications);
- Usage information and statistics about your interaction with the Riddlebit services, which may include the URLs of our websites that you have visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, the application you used or the game you played, how long you used or played it and when, saved preferences, progression and results, and other usage statistics;
- Crash reports, which may be automatically generated when a game or application crashes and includes information about your system and the crash; and
- The general location of your device, which we may derive from your device's IP address.

Some of the technologies used may create small files or record-keeping tools that may be stored on your device. They help us, our service providers, and third parties recognize your device and provide information about how you use and interact with the Riddlebit services.

To make sure the Riddlebit services work properly, Riddlebit uses certain third party services such as Epic Online Services and Amazon Web Services. We are very careful about which third party services we integrate into our game and how they process any of your data but please note that features provided by third parties are subject to those third parties' privacy notices and policies.

#### Fraud Prevention & Anti-Cheat:

We work hard to provide our users with a fair and competitive experience on the Riddlebit services. When you play our games, or otherwise interact through the Riddlebit services, we may use certain anti-cheat and fraud prevention technologies to help us identify and prevent malicious activity. These services may collect and analyze data about the game binary or your computer to detect cheating, and may be provided by third parties.

#### (3) Information We Receive from Others

In some cases, other parties may provide us with information about you, or allow us to collect information about you. We generally collect information from other parties in three ways: (1) you interact with Riddlebit using a service that is not controlled by us, such as a distribution and gaming platform such as Steam, (2) you choose to use a social feature of the Riddlebit services, or (3) you access Riddlebit services through another party, for example a gaming console.

In some cases, we are not able to control the amount or type of information that other parties, like gaming platforms, make available to us. In those cases, we use only the data that we need to provide the types of services we think our users want and expect. Although we cannot control your privacy settings at those websites or how those other parties protect your privacy, once we receive information about you through those websites, we will treat it in accordance with this policy.

When You Interact with Riddlebit through Third Parties and Service providers
When you interact with Riddlebit on a website or app not controlled by Riddlebit, that website or app may allow Riddlebit access to certain information about you. For example, social networks or communication platforms may provide us with your profile information on their services or other information that you agreed the other party could provide to us.

We may also receive information about you from the organizations that sell our games or applications, or which provided the gaming system you use. Those parties may provide us with information regarding your account or registration, but they do not give us your payment

information. Because those organizations determine what information they will collect from you, it may vary according to their services, but is likely to include details such as your display name and user ID for those services, as well as device and region information.

### How We Use information

Generally, the information we collect is used to help us improve, analyze, customize, provide and market the Riddlebit services where we have an appropriate basis to do so.

The information collected will be used for purposes such as:

- To provide and manage our games, website and related services;
- To communicate with you, respond to your requests, or provide you with updates and information;
- To better understand our users and their preferences;
- To personalize your experience, save your preferences, authenticate our users, and provide similar user-experience features;
- To develop, deliver, and improve our products, services, and other offerings, some of which may be offered in partnership with other parties;
- To manage, customize and measure effectiveness of advertisements or promotional offers for the Riddlebit services;
- To manage alpha, beta, or early access tests and collecting feedback from those tests;
- To monitor for security purposes to detect fraud and to protect users from illegal or harmful actions;
- To allow you to communicate with other players in the game;
- To comply with legal obligations; and
- For internal purposes such as auditing and conducting data analysis to better understand and improve our services.

We store personal information for as long as we reasonably need it to fulfill the purposes for which it was collected. We periodically review the personal information we retain to determine whether continued storage is proper.

We may also process information that does not allow for individual identification, including aggregate or de-identified information that we create or collect from other sources or through gameplay. This information will help us to better understand larger groups of users. If we combine this information with information that will allow us to identify individual users, we will treat it as described in this privacy policy. But please note that this privacy policy does not restrict our ability to process information that does not individually identify you, and we may use and disclose aggregated or de-identified information for any reason permitted by law.

# How We Share Information

We may share some of the information we collect to help operate and improve the Riddlebit services. Depending on how you interact with us, common examples might include sharing:

- With partners such as console and platform partners (for example when you access the Riddlebit services through a third-party provider);
- With other users (for example through our in-game chat);
- Publicly (like your display name, content you create may be generally accessible to others);
- With service providers who use that information to help us provide the Riddlebit services (for example, cloud storage providers, hosting or marketing and advertising partners);
- When we believe it is required by law in order to protect you, Riddlebit, or others (for example, as part of an investigation of fraud or other illegal activity, in response to a court order or subpoena, or violation of our terms or policies, or if necessary to protect others from death or serious harm);
- In connection with certain corporate transactions (for example a restructuring, merger or acquisition); and
- We may also share information that does not identify you with third parties, including aggregate or de-identified information.

When you interact with third parties through the Riddlebit Services, please be aware that these may have different privacy practices than Riddlebit. It is encouraged that you review their privacy policies before deciding to share your information with these parties.

## **Data Transfers**

When you use the Riddlebit Services, your information may be transferred to or stored anywhere in the world, including, but not limited to, the United States or other countries where we or our service providers operate. The data protection laws and rules in these countries may be different than those where you live. We strive to keep your information safe as required by applicable laws.

# Your Choices and Rights

We'll generally only ask you for personal information that is necessary to provide the Riddlebit services you request. You can choose not to give us personal information we request, but if you decide not to, you may not be able to access certain parts of the Riddlebit services and some features may not work as intended.

You aren't required to provide consent if you do not want your personal information to be processed for the requested purposes, and may withdraw your consent at any time. Revoking your consent is only effective on a going-forward basis and does not affect the lawfulness of any processing based on your consent before its revocation.

The specific choices available to you often vary depending on the exact nature of our relationship with you, such as the Riddlebit services you use. Common examples include:

- You can request that we provide access to, or that we correct or delete, personal
  information we've collected from you. To do so, please submit your requests to
  access, update, or delete your personal information by contacting us as described in
  "Contact Us" below. We may ask you for additional information to verify who you are
  before completing your request.
- If you receive an unwanted marketing mail from us, you may opt out of receiving any
  future marketing mails at any time by using the opt-out mechanism found at the bottom
  of the email.
- You can change your privacy settings on other parties' websites, such as social networks, which will stop or limit our receipt of information from those other websites.
- You may change your browser settings or take other steps to block, manage, or delete cookies. In some cases, blocking or disabling cookies may cause our websites, games, and applications not to work as intended and some features may not be available.

### **EEA and UK Residents**

If you are an EEA or UK resident, you may have the right to access your information, the right to correct your information, the right to request deletion of your personal information, the right to request restricted processing of your personal information, the right to a portable copy of the personal information you have provided, and the right to object to processing of your personal information, such as for direct marketing. For more information about exercising these rights, send an email to the address specified in the "Contact Us" section below.

EEA and UK residents may contact Riddlebit with any questions or concerns about our

handling of personal information at legal@riddlebit.net. EEA and UK residents also have the right to lodge a complaint with a data protection authority if they have concerns about Riddlebit's handling of personal information.

### California Residents

Riddlebit only uses the personal information we collect to help provide, support, and improve the Riddlebit services as described in this policy, and we do not sell this information to third parties.

If you are a California resident and are not a job applicant, employee or employee of another company interacting with us in your job, you have the right to ask us what personal information we have collected and shared about you, the right to request deletion of your personal information, and the right not to be discriminated against for exercising any of these rights. For more information about exercising these rights, send an email to the address specified in the "Contact Us" section below. Note that we may ask you for additional information to help us verify who you are before completing your request. If we receive your request from an authorized agent, we may ask for evidence that you gave that person authority to submit requests to exercise rights on your behalf.

## How We Protect Information

Riddlebit takes several security measures to protect your personal information unless it is non-confidential by nature.

We maintain appropriate administrative, technical, and physical safeguards to protect your personal information from accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use and other unlawful forms of processing. In some cases, your information is accessible when you log into a feature we offer, and in those cases you need to keep your user credentials and password confidential and secure so that your information is protected.

## Children's Privacy

The Riddlebit services are intended to be appropriate for general audiences and are not directed to children (usually considered to be under 13, depending on where you reside). Riddlebit does not knowingly collect personal information from children.

# **Updates to Our Privacy Policy**

This policy may be updated periodically to reflect changes in our personal information practices or relevant laws. We will indicate at the top of this policy when this policy was last updated. Please review this policy every time you access or use the Riddlebit services to make sure that you have reviewed the most recent version.

## Contact Us

Norway

If you have general questions or concerns about the Riddlebit services (such as game-related issues, trouble accessing your Riddlebit account, bugs or other technical problems, payment matters, or content and entitlement issues), please contact us on support@riddlebit.net.

To learn more about Riddlebit's privacy practices or this policy, please email your questions to legal@riddlebit.net

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