

# PRIVACY NOTICE

## Privacy Notice

The security of your personal information is important to us. This Privacy Notice is designed to help you understand what information we collect, why we collect it, what we do with it and your rights when using or accessing any Game Insight game, application, website or any other digital content on any platform ("**Service**").

For the purposes of this Privacy Notice the controller of personal data is UAB Game Insight, whose contact details are set out below.

This Privacy Notice (together with our Terms and Conditions of Use) sets out the basis on which we process any personal information we collect from you, or that you provide to us through the Service. Information you provide to us, or which we collect, is used for the purposes described in this Privacy Notice.

The terms "Game Insight"/"we"/"our"/"us" when used in this Privacy Notice means UAB Game Insight, and "you"/"your" means you as a user of our Service.

If you have any questions or suggestions regarding our Privacy Notice, please contact us at: [support@game-insight.com](mailto:support@game-insight.com).

**Right to Object:** You have a legal right to object at any time to:

- (i) use of your personal information for direct marketing purposes and profiling; and
- (ii) processing of your personal information which is based on our legitimate interests, unless there are compelling legitimate ground for our continued processing.

## 1. AGE REQUIREMENTS



**advertising to anyone under the age of 18.** If you believe that we might have any information from or about a child under the age of 18, please contact us and we will delete that information as quickly as possible.

## **2. INFORMATION WE MAY COLLECT FROM YOU**

2.1 We collect information to provide better products and Services to you and to comply with our legal obligations. We may collect and process the following information about you:

2.1.1 information that you provide when registering for our Services, when using the Service or contacting us such as:

- Your name, email address, or other contact information you provide to us voluntarily (“Contact Information”);
- Your transaction id, amount of payment (“Payment Information”);
- Your account name, social platform ID and other information from a social platform (when you choose to link a third party platform with the Service);
- other information you choose to give us in-game, via email or web forms, including upon our request.

2.1.2 information that you publish on your user profile or which you post on in-game message boards. Please note that information that you voluntarily make public in your user profile, or which you disclose by posting comments will be publicly available and viewable by others. We do not hold any liability for any information that you voluntarily choose to be public through such and/or other explicit actions;

2.1.3 correspondence, or a record of it, if you should contact us;

2.1.4 surveys that you complete;

2.1.5 data about your device, such as device name and operating system, browser type, language, device manufacturer, or other technical data, available from a device;

2.1.6 data we collect with cookies and similar technologies (see our Cookie policy)

2.1.7 general location data (e.g. country or city location) based on your IP address

2.1.8 data and analytics about your use of our Services (e.g. gameplay progress, levels, purchases made etc.) ("Analytical Information")

2.1.9 your IP address, a mobile device identifiers (this may include: unique mobile device identifier (UDID), International Mobile Equipment ID (IMEI), Android ID, device MAC address, advertising ID for Android platform, ID for advertisers (IDFA) and ID for vendors (IDFV) for iOS platform, OPEN UDID and ODIN). Some of these unique identifiers for mobile devices advertisers use for interest-based advertising. They are consistent across all apps and thus allow cross-app tracking.

Advertising IDs are non-permanent, non-personal identifiers uniquely associated with your device. (See Advertisers section below to find out how to opt-out on your device)

2.1.10 Information about how you play and use the functionality of the Services (including screen recording while you use the Service, which in-game adverts you may have viewed, in-game preferences etc.)

2.2 We may collect your personal information or usage data from third-parties, including:

2.2.1 Social media platforms. We may receive personal information if you choose to link a third party social media platform with the Service. Exactly what information we receive from your social media will depend on your social media privacy settings.

2.2.2. Third party service providers. We may receive personal information about you from third party sources, such as from platforms that the games run on (for example, to verify payment), or demographic data (such as your gender or age).

2.2.3. Advertising partners. From time to time, we may also receive personal information for advertising purposes, so we can provide you with a better Service, enhance our ability to serve you, focus content we provide to you, and offer you opportunities to purchase products or Services we believe may interest you. Additional information may be found in the "Advertisers" section.

2.2.4 We will apply the terms of our Privacy Notice to any personal information received from a

third-party, unless we have disclosed to you otherwise. However, we may not control or be responsible for these third-parties' dissemination of your personal information.

2.3 No special categories of information. We do not request or intend to collect any "special categories of information" such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation. Please, be cautious not to share this information about yourself (or others) using our Services.

### **3. HOW WE USE YOUR INFORMATION**

3.1 The information we collect will only be used in connection with our provision of Services to you and to comply with legal obligations.

We also may share with our service providers and partners personal information, necessary for provision of their services (see point 4.1.2). We use information held about you to assist you as our customer, to provide you with the information you have requested, to improve our Services to prevent fraud, and note your preferences to provide the best user experience possible, and particularly for the following legitimate business purposes:

#### **To provide and operate our Service**

- To create user accounts / profiles to enable you to play our games and use our Services, where necessary;
- To provide, deliver and operate Services you request;
- To enable you to communicate with other users;
- To send you Service-related communications (for example changes, updates, new features);
- To verify and confirm payments (we do not collect or retain credit card information);
- To provide you with the correct versions of our games (for example, language of the game).

#### **To keep the Service safe and fair**

In order to keep the Service and its social features safe and fair, to fight fraud and ensure acceptable use otherwise:

- To monitor use of the Service and its social features;
- To moderate chats either automatically or manually;
- To prevent and/or detect illegal activities, fraud or fraudulent behavior;
- To take action against fraudulent or misbehaving players as well as illegal activities (such as hacking or cheating).

### **To keep eSports tournaments cheat-free and fair**

From time to time, Game Insight together with its eSports tournament partners may organize eSports tournaments of our games (such as ESL Guns of Boom Season 2). Cheat-free and fair eSports tournaments are of utmost importance to Game Insight and its eSports tournament partners. We are putting forth maximum efforts to make sure that eSports tournament rules are followed and enforced to the fullest extent, all contenders have an equal opportunity to compete and the winners are determined by skill rather than cheating.

Therefore, only for the duration of your eSports tournament match, Game Insight may record data relating to your gameplay (for example, capture screenshots). Players who refuse such recording will not be able to join the matches and may be disqualified. Game Insight may use such recorded data for the purposes of cheat investigation and sanctioning. We will send you an in-game reminder before the start of the tournament match.

We kindly ask players to disable device notifications for the whole duration of the tournament match, so they won't be unintentionally captured.

### **To make the Service more suitable for our players**

- To respond to your customer support requests (for example, if you write to us with a complaint or comment);
- To provide social features as part of the Service;
- To conduct optional user feedback surveys;
- To carry out research, testing, optimization, developing and improving the Service and player experience;
- To remember you next time you visit one of our Services;

- To communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by us;
- To receive error messages about any issues you / your device encounters with our Services to enable us to fix bugs and interoperability issues;
- To process and analyze information to understand you, your preferences to enhance your experience and enjoyment using our Services.

### **For promotional activities (including marketing and advertising)**

- To serve you with relevant targeted advertisements;
- To track game installs (for the purposes of measuring the effect of marketing campaign);
- To provide you with special in-game offers and rewards (based on your purchase history and in-game activity);
- To send you marketing communications and/or newsletters, if you consented to receive them.

### **Other**

- To comply with our legal obligations;
- To exercise, establish or defend our legal rights, or to protect your vital interests or those of any other person;
- With your consent, we may process your data for additional purposes.

## **4. INFORMATION WE SHARE**

4.1 We may share your personal information with:

4.1.1 our affiliates and members of the Game Insight group of companies within the EEA and outside the EEA (in the following countries: Latvia, Russia, Belarus);

4.1.2 third party Service providers and partners, who process personal information for the purposes described in this Privacy Notice. Please note that some third parties (our data partners) may be data controllers of your information, and for execution of your rights you may need to contact them directly. More information regarding the third parties we work with can be found here: [Partners](#);

4.1.3 other players and users, as social features are an important component of our games. Users may, for example, see your profile data, in-game activities and read the messages you have posted. Please note that information that you voluntarily make public in your user profile, or which you disclose by posting comments will be publicly available and viewable by others;

4.1.4 any competent law enforcement body, regulatory authority, government agency, court of law or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

4.1.5 with a potential or actual buyer (and its agents and advisers) in connection with any proposed or actual purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information solely for the purposes disclosed in this Privacy Notice. If we (or substantially all of our assets) are acquired by a third party, personal information held by us about our users will be one of the transferred assets;

4.1.6 other persons to process your personal information for us based on our instructions and in compliance with this Privacy Notice.

4.2 We require high standards of confidentiality from such third parties. If any personal information that we collect from you is provided to third parties outside the European Economic Area (EEA) we will ensure appropriate safeguards are in place, such as the standard contractual clauses approved by the European Commission or the Privacy Shield mechanism.

4.3 We may pass aggregated information to third parties about how our users use our Service but this will not include information which could be used to identify you.

## **5. WHERE WE STORE YOUR INFORMATION, DATA RETENTION**

5.1 We take appropriate organizational and technical measures to protect the personal information that we hold. Specific technical measures include data anonymization, a data retention policy and encryption of data in transit. We limit access to your personal information to those who we believe reasonably need to come into contact with that information in order to carry out their jobs.



5.2 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us, one of our associated companies or a third party engaged by us. In this event we will ensure appropriate safeguards are in place, such as the approved standard contractual clauses or the Privacy Shield. We will take all steps reasonably necessary to ensure that your personal information is treated securely at all times and in accordance with this Privacy Notice.

5.3 The transmission of information via the internet is not completely secure. Although we consider the sensitivity of the personal information we collect, process, and store and will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our Service and any transmission is at your own risk.

5.4 **We may retain your personal information** in order to fulfill any of the Services we provide or to comply with applicable legislation, regulatory requests and relevant orders from competent courts. The length of time we will hold or store your personal information will depend on the services we perform for you and how long you require these, and generally falls into the following categories:

5.4.1 game data backups, logs, chat history etc., containing your personal data – shall be retained for up to 14 days; or

5.4.2 any personal data, collected and retained by us (e.g. personalized game progress, payment information, device information etc.) – shall be deleted upon your written request sent to us or within 7 years after your last use of Service, whichever is earlier; or

5.4.3 any personal data, collected and retained by us (e.g. personalized game progress, payment information, device information etc.) – shall be deleted upon ceasing of a particular game operation within 6 months;

5.4.4. eSports tournament-related device screen recordings – shall be deleted within 7 days after the end of the match. If cheating is detected, cheater's recordings shall be deleted upon the end of a particular eSports tournament within 6 months.



## 6. COMPLIANCE AND COOPERATION WITH REGULATORS, LEGAL BASIS FOR PROCESSING PERSONAL DATA

6.1 We regularly review this Privacy Notice and make sure that we process your information in ways that comply with it.

6.1.1 Data transfers: we use servers around the world and your information may be processed on servers located outside of the country where you live. Regardless of where your information is processed, we apply the same protections described in this Privacy Notice and the European requirements for the transfer of your information, as outlined above.

6.1.2 If GDPR applies to the processing of your information, we provide the controls described in this Privacy Notice so you can exercise your right to request access to, update, remove, and restrict the processing of your information. You may also object to the processing of your information in certain circumstances. For more information on your rights, see Section 11 below.

6.2 We process your information for the purposes described in this policy, **based on these legal grounds**:

6.2.1 With your consent. We or our service providers/partners may ask for your consent to process your information for specific purposes (such as for example, direct marketing) and you may withdraw your consent at any time;

6.2.2 When pursuing legitimate interests. We process your information for our legitimate business interests while applying safeguards that protect your privacy. This means we process your information for things like:

- Providing, maintaining, and improving our Services to meet the needs of our users;
- Developing new products and features;
- Detecting, preventing, or otherwise addressing fraud, abuse, security, or technical issues with our websites; and,
- Protecting against harm to the rights, property, or safety of us or our users, or the public as required or permitted by law;

- Providing you with special in-game offers and rewards;
- Keeping eSports tournaments cheat-free and fair.

6.2.3 When entering into or performing a contract. We process your data to provide a Service you have asked for (for example, make a game available to you, provide customer support etc.); and,

6.2.4 When complying with legal obligations. We will process your data when we have a legal obligation to do so, for example, if we are responding to legal process or an enforceable governmental request.

6.3 If you have questions about our legal basis for processing information, you may contact us at [support@game-insight.com](mailto:support@game-insight.com). You can contact your local data protection authority, if you have concerns regarding your rights under local law or would like to complain.

## 7. COOKIES

7.1 We use cookies and similar technologies such as local storage within our apps to provide and optimise our Service. You can control which cookies you get and which you keep on your device through your browser settings. Unless you have adjusted your browser settings so that it will refuse our cookies, our system will issue cookies when you visit our website. However, if you do not accept cookies you may not be able to take advantage of many of the special features of the Service.

7.2 We use cookies to keep track of the pages you and other users have been to on our Service. Cookies enable us to recognise you and remember important information that will make your use of our Service more convenient (e.g. by remembering your user preferences).

7.3 You can disable cookies on your device or set your device to alert you when cookies are being sent to your device; however, disabling cookies may affect your ability to use the Services.

7.4 You can find the full text of our Cookie policy [here](#).

## 8. LINKS

Our Service may contain links to and from other websites and Services. We are not responsible for the

privacy practices or the content of any third party sites. Please check the individual Privacy Notice of any such websites or Services before you submit any personal information to them.

## **9. ADVERTISERS**

Please note that we show third party advertising in our games and also advertise our Services via third parties. We wanted to provide you with more detail about how we use information for advertising, both in-game and on other third party properties.

### **When you view ads on Game Insight's properties**

To enable us to show in-game ads we may send your advertising ID, IP-address and other information to advertisers (or ad networks) to enable them to find appropriate ads to serve to you in our games and on third party properties. You can control and limit our use of your advertising ID in your device settings. Game Insight does not control which specific ads are shown in our games (this is controlled by ad networks) but we do blacklist certain categories of ads.

Advertising IDs are used by the ad networks for a number of purposes, for example, to:

- limit the number of times you see the same ad;
- ensure they are dealing with humans/with real devices and not automated bots;
- to serve you with advertisements likely to be relevant to you;
- other brands buy advertisement placement via an ad network or ad exchange to advertise their products in Game Insight's games. The ad network or ad exchange acts as intermediary between the other game companies and Game Insight. In order for an ad network to charge the company buying the ad, clicks from the ad and potentially installs of other developers' applications party apps are tracked. Views, clicks, installs and similar events from ads are measured using Advertiser ID.

IP-address is typically used by advertisers to broadly see the general geographic area you are coming from for example country, state, and sometimes at city level.

### **When you view Game Insight's ads on third party services**

Game Insight also advertises its games in other apps by asking ad networks to serve its ads to audiences that will be interested in them. The advertising IDs are used by the ad networks for a number of purposes, including, for example, to measure ad effectiveness (looking at aggregated views, clicks and installs it generates through its advertising in other publishers' games). Advertising IDs are also used to track views, clicks, installs and other similar events from ads.

You can opt out of interest based advertising on mobile applications by changing the privacy settings of your device and selecting "limit ad tracking" (Apple iOS) or "opt out of interest based ads" (Android).

## 10. KEEPING YOUR ACCOUNT SECURE

10.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Service, you are responsible for keeping this password confidential and you are responsible for any misuse of such information. You must change your password on a regular basis and must not share your password with anyone.

10.2 You are solely responsible for the security and confidentiality of your account. Please ensure that you do not allow anyone else to access the Service in your name and sign off after you have finished accessing your account.

10.3 You are responsible for all orders, and for the accuracy of all information, sent via the internet using your user ID, password or any other personal identification used to identify you on the Services.

## 11. YOUR RIGHTS

11.1 You have the following rights over the personal information we hold about you:

- (a) **to access, correct, update or request deletion** of your personal information;
- (b) **to object to processing** of your personal information (which is processed on the grounds of legitimate interests), ask us to **restrict processing** of your personal information or **request portability** of your personal information (request that data which you have provided to us is provided to you, so you can transfer this to another data controller);

(c) to opt-out of personalized offers based on your in-game activities and behavior and to object to use your personal information for direct marketing purposes;

(d) if we are processing your personal information with your consent, you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

(e) you have **the right to complain** to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

You may exercise all the above mentioned rights by creating an in-game support ticket or by contacting us using the details at "How to Contact Us" section below.

You can control and limit the nature of personal information that we collect and process about you in a number of ways. For example, you can disconnect your social media account from our games or control your social media privacy settings to limit the information shared with us. You could also reset your mobile advertising identifier or limit ad tracking altogether using the settings on your device. You could also limit or disable the use of cookies (or similar technologies).

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

11.2 If you have any questions, would like to contact us about the processing of your information or wish to exercise your rights as described above, you may contact us at [support@game-insight.com](mailto:support@game-insight.com). We may require evidence of your identity before we are able to act on your request.

11.3 You may "opt out" from collection of your personal information by contacting us at [support@game-insight.com](mailto:support@game-insight.com).

## 12. CHANGES TO OUR PRIVACY NOTICE

We occasionally modify our Privacy Notice and any changes we may make to it in the future will be posted on this page and, where necessary, may be communicated to you.

### 13. HOW TO CONTACT US

Data controller: UAB “Game Insight” Address: Antakalnio str. 17, LT-10312 Vilnius, Lithuania.

If you have any questions about data protection, or if you have any requests for resolving issues with your personal data, we encourage you to primarily contact us through the in-game support ticket, as we can more accurately validate your request received directly from a device and application.

You can also send a support ticket through our website [www.game-insight.com](http://www.game-insight.com) or send us an email to: [support@game-insight.com](mailto:support@game-insight.com).

Additionally, if your issue is not resolve by the above mentioned means, you could contact directly our Data Protection Officer at [dpo@game-insight.com](mailto:dpo@game-insight.com).

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