**Privacy Policy**

**Effective Date: 22nd of FEB 2023**

EPSILON STUDIOS is an English Independent Video Game and Software development company with its official website being (https://EpsilonStudios.uk). The Company complies with all applicable laws related to personal information and the Company strives to protect the rights of individual users by adopting Privacy Policy that is in accordance with relevant laws and regulations. The Company is the data controller of your personal information. If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact our Privacy Officer by email at: Epsilon.Privacy@Epsilonstudios.uk

**1. Personal Information Collected From Users**

As used in this Privacy Policy, “Personal Information” is information that would allow someone to identify or contact you, including, for example, your full name, address, telephone number, or email address. Personal Information does not include aggregated information that, by itself, does not permit the identification of individual persons (like statistics about how many persons visited the Site last month, or how many visitors are male and how many are female).

The Company generally collects or receives personal information in three ways.

1) Collecting personal information directly from users

You may provide us with the following information when playing the Game or visiting the company’s website.

* ID (Email address), password to create and use.
* Email address, name and in-game character name (nickname) to use customer service and/or Forum features.
* Email address, name, date of birth, country of residence, and in-game character name (nickname), Steam Account Name to apply for participation in possible events, tournaments and other events held by the Company.
* Character nickname can be collected by the company when creating a character in-game.

2) Collecting personal information automatically from users

When users visit the website and/or use the Service, the Company may automatically collect IP address from users (The Company will not use IP address as a personal identifier but will generally use to resolve technical problems and to improve quality of the server). Also, the Company may automatically collect MAC address from users only to identify official internet café certified by the Company when using the Service.

3) Collecting personal information from the third party.

The company offers the Game service through STEAM ™ Platform, provided by Valve Corporation. The Company collects the following personal information from Valve Corporation to identify individual users as an encrypted form.

Personal information may also be required to enter into a contract with you or to perform a contract with you (such as to provide Service at your request), and failure to provide any information may result in our inability to provide requested services or products.

**2. Non Personal Information Collected From Users**

The Company may collect following non-personal information when playing the Game.

(Non-personal information means information that cannot be used to identify a specific user.)

• User statistics collected from the game service. (e.g. Number of games played, game playtime, etc.) Users can check these information through built-in feature in the game.

• Information about your computer, device, hardware and operating system.

EPSILON STUDIOS will automatically collect certain non-Personal Information about your use of the Site. We might collect, among other things, information concerning the type of Internet browser or computer operating system you are using, the domain name of your Internet service provider, your browsing behavior through the Site, and the web site or advertisement that was linked to or from the Site when you visited. To do this, we may use cookies and other technology (see below). Your visits to the Site, and information provided through these technologies, will be anonymous unless you provide us with Personal Information or have provided such information in the past. This information is used to help improve the Site, analyze trends, and administer the Site.

**3. Information Collected From Third Parties**

Steam Connect; You can connect your Steam Account with Global Account through login service that the official website provides, and we collect Steam ID when Global Account and Steam Account becomes connected. This information is collected by Valve Corporation and is provided to us under the terms of Valve Corporation’s privacy policy

Twitch Connect; You can connect your Twitch Account with Global Account through login service that the official website provides, and we collect Twitch ID when Global Account and Twitch Account becomes connected. This information is collected by Twitch Interactive, Inc. and is provided to us under the terms of Twitch Interactive, Inc.’s privacy policy

**4. Cookie And Related Technologies.**

EPSILON STUDIOS uses cookies and other technologies to collect demographic information, personalize your experience on the Site and monitor advertisements and other activities. Cookies are small files downloaded to your computer (if your browser is enabled to accept cookies) to track movements within web sites. We may link cookie information to Personal Information. We use cookies and other technology to customize your experience within the Site. Personal Information collected through the use of these technologies will be handled according to this Privacy Policy.

Most Internet browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. You should refer to your browser instructions or “Help” screen to learn more about how to manage cookies. Please note, however, that if you block cookies, some portions of the Site may not function properly.

We do not control cookies in third party ads, and you are encouraged to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technology. The ads appearing on the Site may be delivered to you by third-party advertising companies. These companies may use information about your visits to this and other web sites in order to provide advertisements on the Site and other sites about goods and services that may be of interest to you.

We also maintain log files which contain Internet Protocol (“IP”) addresses. An IP address is a numeric address that is assigned to your computer by your Internet Service Provider. We use log files to monitor traffic on the Site, to report information to our advertisers and to troubleshoot technical problems. In the event of user abuse of the Site, we may block certain IP addresses. IP addresses may be used to personally identify you in order to enforce our Terms of Service and any applicable end user license agreement.

Google® Analytics;

More specifically, EPSILON STUDIOS may use the following advertising functions of Google® Analytics and collect personal information as provided by Google®, and you may withdraw your consent by deactivating such functions in Google®’s advertising settings: Remarketing by using Google® Analytics; Google® Display Network Exposure Report; Google® Analytics Demographics and interests Report; and Integrated service allowing the collection of data through Google® Analytics by using advertising cookies and anonymous IDs. More information about Google’s own privacy policy can be found at <https://www.google.com/policies/privacy>

**5. How Information Collected Becomes in Use**

The company collects personal information to provide the Service to users and to improve quality of the Service. The Company may share personal information with third parties if sharing personal information is necessary in terms of providing the Service.

In the majority of cases, processing of your personal information will be justified on the basis that:

* the processing is necessary to perform a contract with you or take steps to enter into a contract at your request: Most of the time, the reason we process your information is to perform the contract that you have with us. For instance, as you go about using our Service, we use your information to maintain your account and your profile and to provide Service and customer support to you.
* the processing is in our legitimate interests, which are not overridden by your interests and fundamental rights: We may use your information where we have legitimate interests to do so. One of our legitimate interests are to use website user and visitor data to conduct and develop our Service and business activities with them. We may also analyze users’ behavior on our services to continuously improve our Service, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.
* the processing is necessary for us to comply with a relevant legal obligation: For example, we may process your personal information to comply with applicable accounting rules which require keeping accounting records and to make mandatory disclosures to law enforcement.
* you have consented to the processing: From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal by contacting us at the address provided at the preamble of this Privacy Policy.

1) Use of personal information collected in the Game

The Company may collect personal information in order to provide the service and to improve quality of the service. These include:

* Provide customer support by collecting and answering inquiries.
* Provide forum service on the website
* Solve technical problem and improve quality of the service.
* Identification of individual users to provide the game service
* Technical protection against usage of unauthorized programs.

2) Use of non-personal information collected in the Game.

The Company may use and collect non-personal information to provide and improve the service and may share non-personal information third parties if necessary. The Company reserves the right to process non-personal information collected from users. These include:

* Tracking usage patterns and analyzing trends of users
* Technical protection against unauthorized program usage
* Preventing inappropriate gameplay that could harm other users
* Technical problem resolution and improved server quality.
* Searching user statistics and provision of leaderboard.
* Sharing game data with third parties may include statistical information about user’s gameplay, which are provided by the Company through APIs (e.g. duration and number of games played, etc.)

3) Use of non-personal information from the Site

When you use the Site, we may retrieve information about your hardware system and how our services are used, including your IP address. We use this information to enable you to use the services offered through the Site over the Internet. We also use this information to better understand the behavior and preferences of our customers, so that we can improve our products and services.

The Personal Information collected from you will be used to operate the Site and to provide the products or services or carry out the transactions you have requested or authorized.

In support of these uses, EPSILON STUDIOS may use Personal Information to provide you with more effective service, to improve the Site and any related EPSILON STUDIOS products or services, and to make the Site easier to use by eliminating the need for you to repeatedly enter the same information. In order to offer you a more consistent experience in your interactions with EPSILON STUDIOS, information collected by the Site may be combined with information collected by EPSILON STUDIOS from other sources.

We may merge Site-visitation data with demographic information, and we may use this information to provide more relevant content. We may combine Site-visitation data with your Personal Information in order to provide you with personalized content.

EPSILON STUDIOS may hire other companies to provide products or services on our behalf, and we may provide such companies with Personal Information to help them perform their duties.

Under the requirements of most applicable data protection laws, EPSILON STUDIOS may disclose Personal Information to (a) conform to the edicts of the law or comply with legal process served on EPSILON STUDIOS; (b) protect and defend the rights or property of EPSILON STUDIOS or its affiliates; or (c) act in urgent circumstances to protect the personal safety of EPSILON STUDIOS employees or agents, users of EPSILON STUDIOS products or services, or members of the public.

You will be deemed to have consented to the disclosure to, and use by, a subsequent owner or operator of the Site, of any Personal Information contained in our database for such site, if EPSILON STUDIOS or one of its companies assigns all of its rights and obligations regarding the use of your Personal Information at the time of a bankruptcy, merger, acquisition, sale of all or substantially all of EPSILON STUDIOS’s assets to a subsequent owner or operator, or similar event under the most applicable data protection laws.

Please do not use your real name or the real name of another person when selecting a username. Please note that your username will be available to the Internet’s general public while you participate in some services, like message boards or forums, so you should exercise discretion when using these services. We are not responsible for protecting such information that you may disclose to third parties through our services.

4) Sharing personal information to Third Parties

Whilst specific requirements of data protection law vary depending on applicable national laws, the Company may give permission to third parties, including service providers which process personal information on behalf of the Company to provide customer support and to manage community. Examples of these third parties include:

* other users (for example, when you voluntarily disclose information on the service);
* our business partners (for example, in order for them to provide you with discounts or offers that may interest you);
* customer service providers to provide customer support service;
* External platform service providers to connect global accounts with external platforms;
* Third party program restriction providers to block cheating tools and unauthorized programs;
* cloud computing service providers to provide cloud storage services;
* payment service providers to assist with payment for transactions or providing withdrawing service for sellers; and
* marketing platforms and providers of analytics services relating to users’ behavior, in order to tailor the Service.

If the company chooses to allow third party to process personal information, third party vendor will process personal information only to the extent that is necessary to perform the services requested by the company.

The following companies may process some or all personal information collected by the Company.

* Company: EPSILION STUDIOS
* Purpose: providing payment, billing, distribution, and marketing tools.
* Retention Period: Outsourcing contract is expired or terminated.

Sharing of information sometimes involves cross-border data transfers to countries outside of the EU and other regions with comprehensive data protection laws. We will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection. If your personal information is transferred outside the EU to the Company’s affiliates or to third party service providers, we will also take steps to ensure that your personal information receives the same level of protection as if it remained within the EU, including by entering into data transfer agreements using the European Commission approved Standard Contractual Clauses, or by relying on certification schemes such as the EU – US Privacy Shield. You have a right to obtain details of the mechanism under which your personal data is transferred outside of the EU by contacting Epsilon.Privacy@EpsilonStudios.uk

**6. Personal Information Retention and Removal**

In principle, the Company will remove your personal information without any delay after the purpose of collecting personal information is achieved. Personal information stored as hard copy will be shredded or incinerated, and personal information stored as soft copy will be removed using a technical measures in a way that cannot be reproduced. However, the following information can be stored.

* Steam: Game character name (nickname), IP address, steamID64, Steam ID, Display Name, Profile Image: Until Steam membership termination or game refund
* Twitch: Display name, Email address, Username, Twitch ID: Until Twitch membership termination
* Records of customer support or dispute resolution: 3 years
* Record of fraudulent user’s duplicate membership: 5 years

**7. Children Under The Age Of 17.**

Because the Site is not directed to children under the age of 17, we prohibit registration to persons under age 17. If you are under the age of 17, you may not create an account on the Site. We will not knowingly collect, maintain, or disclose any Personal Information from children under the age of 17.

**8. Children Between The Ages Of 13 And 18.**

In order to protect the privacy interests of younger Internet users, EPSILON STUDIOS does not allow children under the age of 18 to use our services without the consent of their parents. EPSILON STUDIOS complies with the Children’s Online Privacy Protection Act and all other applicable laws and regulations concerning children and the Internet. We do not disclose any Personal Information about children under 18 years of age who have registered on the Site to third parties, or share or disclose Personal Information other than as set forth in this Privacy Policy; provided however, that in the event of a merger, acquisition, bankruptcy, or similar transaction, management of our customer information may be transferred to our successor or assign.

**9. Links And Third Party Services.**

If you click on a link to a third party site, including on an advertisement, you will leave the Site and go to the site you selected. Because we cannot control the activities of third parties, we cannot accept responsibility for any use of your Personal Information by such third parties, and we cannot guarantee that they will adhere to the same privacy and security practices as EPSILON STUDIOS. We encourage you to review the privacy policies of any other service provider from whom you request services. If you visit a third party website that is linked to the Site, you should consult that site’s privacy policy before providing any Personal Information.

**10. Security Of Personal Information.**

EPSILON STUDIOS follows generally accepted industry standards to protect Personal Information submitted to us, both during transmission and once we receive it. When you enter sensitive information (such as a credit card number) on the Site, we encrypt that information using secure socket layer (SSL) technology. However, no method of transmission over the Internet, or method of electronic storage, is completely secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

**11. Other Agreements That Govern Your Use Of The Site.**

In addition to this Privacy Policy, your rights and obligations concerning the use of the Site are governed by our Terms of Service, any end user license agreement, any other supplemental agreements, and other applicable policies, guidelines, and requirements. When you sign up to use the Site, please review each such agreement carefully, as you must agree to be bound by each such agreement before you may use the service.

**12. Your Rights.**

Subject to limitations in applicable law, you are entitled to object to or request the restriction of processing of your personal information, and to request access to, rectification, erasure and portability of your own personal information. To make requests, or if you have any other question regarding our privacy practices, please contact our Privacy Officer by email at:Epsilon.Privacy@EpsilonStudios.uk. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Please also see the “Your Choices” section of this Privacy Policy for additional choices regarding your information. In certain countries, including in the EU, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process your personal information. The data protection authority you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

**13. Your Choices**

* You can either choose to remove or to stop process of personal information at any time. If you wish to remove or stop process of your personal information, please contact us in writing or through e-mail.
* You may visit the Company’s website without providing any personal information. If you do not agree to provide personal information, the company may not be able to provide you with the game services, customer support, or Forum related services.

**14. How We Protect Information Collected**

The Company is committed to provide physical, technical and administrative safeguards with the personal information collected to ensure that your personal information is not lost, stolen, exposed, altered or damaged. However, it is difficult to guarantee complete protection of all information. Hence, you should acknowledge that complete protection of personal information cannot be guaranteed if you choose to use our services.

**15. Amendments**

Privacy Policy for Game is available in the Company’s website and we reserve the right to amend this Policy at any time. We encourage you to review this Policy periodically in order to make sure how any personal information you provided will be used. Your continued use of the Services following the changes to these terms will mean you accept future amendments.

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this policy, we will also revise the “last updated” date at the top of this Privacy Policy, and may attempt to notify you by email, pop-up screen, or by means of a notice somewhere else on the Site. Your continued use of the Site will signify your acceptance of the changes to our Privacy Policy.