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# Privacy Policy

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## BUDGE STUDIOS PRIVACY POLICY

Last update: February 28, 2019



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### 1. INTRODUCTION

This Privacy Policy (the "**Privacy Policy**") describes how Budge Studios Inc. ("**Budge Studios**", "**we**", "**our**" or "**us**") collects, uses and discloses information about you as well as your rights and choices about that use and disclosure, and applies to your use of the Budgestudios.com and Budgestudios.ca websites (the "**Sites**"), the <sup>top ↑</sup>



Apps and Programs  
collection, use or

By using the Platform

and other activities described therein. If you do not agree, discontinue any use of our Platforms. In case of discrepancies between the English version and any other versions of this Privacy Policy, the English version shall prevail.



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## 2. ESRB PRIVACY CERTIFIED

The ESRB certification seal shown on our Platforms confirms that Budge Studios is a valid licensee, and participating member, of the [Entertainment Software Rating Board's Privacy Certified Program](#) ("ESRB Privacy Certified"). To help protect your privacy, we have voluntarily undertaken this privacy initiative and have had all areas of our Platforms where this Privacy Policy is posted reviewed and certified by ESRB Privacy Certified to meet established online information collection, use, and disclosure practices. As a licensee of this program, we are subject to audits of our Platforms and other enforcement and accountability mechanisms administered independently by the ESRB.

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## 3. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Please check the Privacy Policy each time you use our Platforms to ensure you are aware of any changes in our privacy practices. Our Privacy Policy will indicate the date it was last updated. Your continued use of our Platforms will signify your acceptance of the changes to our Privacy Policy. **If there is a material change in the way that we use your information under this Privacy Policy, we will notify you via email of the relevant changes or provide other prominent notice on our Sites and/or Apps.**


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## 4. HOW DOES BUDGE STUDIOS HANDLE CHILDREN'S INFORMATION?

### A. Children's Use of the Platforms.

Budge Studios has developed its Platforms to be an enjoyable experience for users of all ages. Some parts of the Platforms are primarily targeted at children, such as many of our Apps, while others are intended for parents, such as our Sites and Programs. Whenever we refer to "children" in this Privacy Policy, we mean children under the age of 13, unless otherwise indicated.

Budge Studios complies with the Children's Online Privacy Protection Act ("COPPA"), a U.S. law designed to protect the online privacy of children. Budge Studios takes precautions designed to protect the online privacy



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If you have any questions about our compliance with COPPA, please contact us. We would like to learn more about COPPA, you can refer to the [Children's Privacy](#) section of the Federal Trade Commission's website.

**B. Sites and Programs.** Budge Studios does not knowingly collect personal information as defined by COPPA from children through its Sites or Programs. If we learn or have reason to suspect that we have collected personal information from a child in violation of COPPA, we will promptly delete it. Parents should note that if they provide information about their child through a Site or Program, COPPA will not apply to that information.

### C. Apps.

- **List of Child Directed Apps.**

For a list of Apps that Budge Studios treats as being primarily directed to children under COPPA ("Child Directed Apps"), please contact us as set out in the [How Do I Contact Budge Studios?](#) section.

- **Collection, Use, and Sharing of Information from Children.**

We collect, use and share personal information from children through our Apps as follows:

- o **Registration.** For our Child Directed Apps, Budge Studios treats all users as children and does not screen users for age or offer registration. For our general audience Apps, Budge Studios may age screen users in accordance with COPPA and, where Budge Studios identifies a child user, either (1) direct that child to a version of the App treated as a Child Directed App that collects, uses and shares personal information in accordance with this section, or (2) [seek verifiable parental consent in accordance with COPPA to the collection, use and sharing of personal information as otherwise set out in this Privacy Policy](#) and, subject to receiving such consent and complying with COPPA, direct that child to a version of the App that collects, uses and shares personal information as otherwise set out in this Privacy Policy.

- o **Email Contact.** On occasion, in order to respond to a question or request from a child through a Child Directed App, Budge Studios may receive or need to ask for the child's online contact information, such as an email address. Budge Studios will delete this information immediately after responding to the question or request.

- o **Photos, Videos, and Audio.** Our Child Directed Apps may request access to the device's camera, photo album, or microphone in order to provide in-game functionality. For example, a child may blow into the microphone in order to blow out cartoon candles or take a photo of their arm with a cartoon bracelet and save that image to their local device. Budge Studios does not store or share any photos, videos, or audio files that contain children's images or voices through our Child Directed Apps. All photos, videos, and audio files are stored locally on the device only.



not collect any personal information at any time through our mobile apps.



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#### o **Persistent Identifiers**

identifiers or IP addresses, through our Child Directed Apps solely for the purpose of providing support for the internal operations of the Child Directed Apps or as otherwise permitted by COPPA. This information may be collected by Budge Studios or a third party providing a service to Budge Studios.

o **In-App Advertising.** Some of our Child Directed Apps incorporate advertising serving technology offered by our third party service providers, which enable advertising to be temporarily uploaded into the game and replaced while the user plays. The data collected for this purpose may include persistent identifiers solely for the purpose of providing support for the internal operations of the Child Directed App as permitted by COPPA, such as allowing our third party service providers to calculate the number of views, cap the frequency of ads and serve ads in a format that fits the device. Please note that while our Child Directed Apps may contain advertisements about Budge Studios or third party products and services, we prohibit behavioral advertising to children in our Child Directed Apps or through data collected from our Child Directed Apps.

Subject to our compliance with COPPA, Budge Studios may collect, use, share and otherwise process personal information from children in accordance with this Privacy Policy. We may also seek verifiable parental consent as necessary to comply with COPPA. In either case, we will not collect more personal information from children than is reasonably necessary to participate in our Child Directed Apps.

#### • **Security**

We take reasonable measures to maintain the confidentiality, security, and integrity of children's personal information collected through Child Directed Apps, including by taking reasonable steps to release such information only to parties capable of maintaining its confidentiality and security. We retain children's personal information only as long as necessary to fulfill the purpose for which it was collected, and delete such information using reasonable measures to protect against its unauthorized access or use.

#### • **Parental Choices and Controls**

As part of the verifiable parental consent process, where applicable, parents and legal guardians will have the choice of consenting to our collection and internal use of their child's personal information but prohibiting us from disclosing that information to third parties (except to the extent such disclosure is integral to our Apps). Additionally, any parent has the right to: (1) review, correct, or delete the child's personal information; and/or (2) discontinue further collection, use, or sharing of the child's personal information. Please note that exercising these choices may restrict your child's ability to access certain functionality of the Apps. To exercise any of these choices, please contact us as set out in the [How Do I Contact Budge Studios?](#) section.

If you are a parent or guardian and believe that we have collected your child's personal information in violation of COPPA, please contact us as set out in the [How Do I Contact Budge Studios?](#) Section, and we will remove such information to the extent required by COPPA.

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Budge Studios collects information you provide when you use our mobile apps, newsletters, join our community, or use our services. We use third-party service providers to collect information.



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information you provide to our service providers to collect information.

The information we collect includes information that can be used to identify a specific individual (whether alone or in combination). Some examples of information you provide include the following:

- **Contact data**, including your first and last name, email address, home address, and phone number.
- **Demographic data**, including your age, gender, preferred language, country and zip code or postal code.
- **If you a parent or legal guardian**, information about your child such as your child's first name and last name initial, year of birth, gender, and country of residence.
- **Content**, including content within any messages you send to us (such as provided in surveys or questions to customer support).
- **Resume Data**, including your employment history, transcript, writing samples, and references as necessary to consider you for a job opening if you submit an application to us.

You may choose to voluntarily submit other information to us through the Platforms that we do not request, and, in such instances, you are solely responsible for such information.

## B. Information Collected Automatically.

Budge Studios automatically collects information about your use of the Platforms to help us improve our services or for other purposes as described in this Privacy Policy. Some examples of information we automatically collect include the following:

- **Service Use Data**, including information about online activity such as feature usage, game play statistics and in-app purchases.
- **Device Connectivity and Configuration Data**, including information about hardware, software, platform, media, connection data, your internet service provider, and your device's regional and language settings. This includes device identifiers such as IP address, MAC address, and Ad Id (e.g., IDFA or AAID).
- **Location Data**, including location derived from an IP address or data that indicates a city or postal code level. We do not collect precise location data.



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- **Log Files**, which

- **Cookies**, which

Use of cookies makes web-surfing easier by performing certain functions such as saving language preferences and maintaining your sessions while you are on our Sites. The cookies used on our Sites contain information used for site navigation and analytics and are used in combination with pixels, as further discussed below.

- **Pixels** (also known as web beacons), which is code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a third party to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We incorporate pixels from third parties that allow us to track our conversions, bring you advertising both on and off the Sites, and provide you with additional functionality.
- **Device Fingerprinting**, which is the process of analyzing and combining sets of information elements from your device's browser, such as JavaScript objects and installed fonts, in order to create a "fingerprint" of your device and uniquely identify your browser and device.
- **App Technologies**, which are technologies included in our Apps that are not browser-based like cookies and cannot be controlled by browser settings. For example, our Apps include third party SDKs, which is code that sends information about your use to a server. These SDKs allow us to analyze the performance of our Apps, bring you advertising both on and off the Apps, and provide you with additional functionality. However, for our Child Directed Apps, we do not collect information for behavioral advertising.

For more information on the use of Tracking Technologies within our Platform and your rights and choices regarding Tracking Technologies, see the [What Should I Know about Third Parties?](#) and [What Are My Rights and Choices?](#) sections below.

### C. Information from Other Sources.

We also collect information from other sources. To the extent we combine third party sourced information with information we have collected through our Platforms, we will treat the combined information in accordance with the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the data. These third party sources vary over time, but have included:

- o **Social networks**, when you engage with our content, reference our Platforms, or grant us permission to access information from the social networks.
- o **Partners**, that offer co-branded services, sell or distribute our products, or engage in joint marketing activities.

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## 6. HOW DOES BU

Budge Studios uses the information you provide us for the purposes of:

- **Managing and optimizing our Platforms, including:**

- o Enabling your use of our Platforms and access to certain areas of our Sites, Apps or Programs; o Delivering you customized content; o Monitoring and analyzing trends, usage, and activities; and o Diagnosing problems with and improving our Platforms.

- **Communicating with you and facilitating your requests, including:**

- o Responding to your comments, questions and requests, including providing customer support; o Registering you in a Program such as Budge Playgroup (beta-testing of new Apps); o Administering Promotions, including verifying eligibility and awarding prizes, which are only directed to adults and non-child users; and o Subscribing you to Budge Studios' newsletter, which may include advertisements and communications alerting you to new products, features and enhancements, special offers upgrade opportunities, and contests and events of interest.

- **Protecting our Platforms and user rights, including:**

- o Obtaining verifiable parental consent, as necessary; o Preventing and addressing fraud, breach of policies or terms, and threats of harm; and o Sending you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.

- **Advertising, including:**

- o Developing and providing you with direct marketing, including advertisements about our and third party products, offers, promotions, rewards, events, and services; and o Serving advertising tailored to your interests, which is not collected from information collected through Child Directed Apps.

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## 7. HOW DOES BUDGE STUDIOS SHARE OR DISCLOSE INFORMATION?

Budge Studios shares the information we collect in accordance with the practices described in this Privacy Policy for the limited purposes described below.

- **Service Providers.** We transfer information to third party service providers that perform services on our behalf or otherwise collect, use, disclose, store or process information on our behalf for the purposes described in this Privacy Policy (such as for completing purchases, data analytics, marketing and advertising, website hosting, and technical support). Some of these service providers may be located in a country other than where you reside, including in Canada or the United States, and your information may be stored or [top ↑](#)





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- **Partners.** Budge Studios shares information with our partners in connection with offering co-branded services, selling or distributing our products, or engaging in joint marketing activities.
- **Contests, Sweepstakes and Promotions.** If you voluntarily enter a contest, sweepstake or promotion ("Promotion"), we share information with third parties as set out in the official rules that govern the Promotion as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a Promotion, you agree to the official rules of that Promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other parties to use your name, voice and/or likeness in advertising or marketing materials. Unless specifically indicated with additional terms, Promotions are only directed to adults and non-child users.
- **Business Transactions.** We reserve the right to transfer any information we have about you in connection with the sale or transfer of all or a portion of our business or assets or rights relating thereto.
- **Affiliates.** We may share information with our affiliates for their own business purposes.
- **Legal Rights and Obligations.** We may use and/or disclose your information to enforce legal rights and comply with the law, or to comply with an order from a government entity or other competent authority, or when we have reason to believe that a disclosure is necessary to address potential or actual injury or interference with our rights, property, operations, users or others who may be harmed or may suffer loss or damage. When necessary, we may also disclose information to law enforcement, or to the appropriate civil authorities.
- **Consent.** We may share information to fulfill any other purpose as directed by you or with your consent. Generally, by providing us with information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified at the time that we collect the information from you or as otherwise described in this Privacy Policy. In the case of children under 13, as applicable, we will obtain a parent or legal guardian's verifiable consent prior to the collection of personal information from such users, unless the collection of such information falls within an exception that is permitted under COPPA.

Notwithstanding the above, Budge Studios may share or disclose information that does not identify you (including information that has been aggregated and de-identified) with third parties except as prohibited by applicable law. For more information on your rights and choices regarding how we share information about you, please see the [What Are My Rights and Choices?](#) section below.

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## 8. WHAT SHOULD I KNOW ABOUT THIRD PARTIES?

### A. Third Party Services.

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Third Party Services from whom you request services. If you visit a Third Party Service that is linked to on a Budge Studios Platform, you should consult that site's privacy policy before providing any information on that site.

By using our Platforms, you acknowledge that you understand and agree that we may share information with third parties, we do not guarantee the accuracy of the information that we provide to you to help you to better understand our Platforms.

## B. Third Party Features.

We may offer portions of our Platforms on or integrate portions of our Platforms with Third Party Services ("Third Party Features"). For example, we offer content on social networks such as a Facebook and Twitter. Any information you provide to us when you engage with our content (such as through our brand page) is treated in accordance with this Privacy Policy. Also, if you publicly reference our brand on a Third Party Service (e.g., by using a hashtag associated with Budge Studios in a tweet or post), we may use your reference on or in connection with our Platforms. Please be aware that if you use a Third Party Feature, both we and the applicable third party may have access to and use information associated with your use.

## C. Analytics and Advertising.

Our Sites and Apps contain Tracking Technologies owned and operated by Third Parties. For example, we use Tracking Technologies from third party analytics providers, such as Google Analytics, to help us analyze your use of the Sites and Apps, compile statistic reports on the Site's and Apps' activity, and provide us with other services relating to Site and App activity and internet usage. We also work with ad serving services, advertisers, and other third parties to serve advertisements on the Sites, Apps, and/or on Third Party Services. These third parties may use Tracking Technologies on our Sites, Apps, and Third Party Services (including in emails and advertisements) to track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you on the Sites, Apps, and Third Party Services or third party devices after you have left them ("behavioral advertising").

We do not engage in behavioral advertising in our Child Directed Apps. For further information on advertising in Child Directed Apps, please see the How Does Budge Studios Handle Children's Information? section above.

For further information on Tracking Technologies and your rights and choices regarding them, please see the [Information Collected Automatically](#) and [What Are My Rights and Choices?](#) sections.

## D. Advertising with SuperAwesome.

Our Apps may display advertisements served by SuperAwesome Trading Limited ("**SuperAwesome**"), a provider of kid-safe advertising services that are designed specifically for the compliance requirements of younger audiences, including those aged under 13. SuperAwesome places contextual advertising on Apps without collecting any personally identifiable information, including persistent identifiers.



SuperAwesome is a privacy, SuperAwesome and certified by E



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protect your privacy. Your privacy has been reviewed and approved. Our privacy and disclosure practices are subject to frequent audits and other enforcement and accountability mechanisms administered independently by ESRB Privacy Certified.

SuperAwesome also provides advertising services in compliance with the General Data Protection Regulation (EU 1996/679). Adopting an approach of 'privacy by design and by default', SuperAwesome utilises proprietary technologies so that it neither collects, stores nor shares your personal data to provision advertisements or target advertising to you.

You may contact SuperAwesome directly at [privacy@superawesome.com](mailto:privacy@superawesome.com) on + 44 203 668 6677, or by post: Privacy Team, SuperAwesome Trading Limited, 8 Duncannon Street, London, England, WC2N 4JF, United Kingdom.

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## 9. WHAT ARE MY RIGHTS AND CHOICES?



### A. Reviewing, Correcting and Deleting Your Information.

If you wish to request access to certain information you have voluntarily submitted to Budge Studios or request that such information be corrected or deleted, or if you have any questions, comments, or concerns about this Privacy Policy or the information practices of Budge Studios, please contact Budge Studios as set out in the [How Do I Contact Budge Studios?](#) section below. Your right to access, correct, or delete your information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you believe we have collected and stored any personal information from children under 13 in violation of COPPA, **parents or legal guardians can request access to review such information, have it deleted, or stop our further collection or use of such information.** To make any of these requests (when applicable), please contact us as set out in the [How Do I Contact Budge Studios?](#) section below.

### B. Tracking Technology Choices.

- **Cookies and Pixels.** Most browsers accept cookies by default. If you would prefer not to receive cookies, you can alter the configuration of your browser to refuse or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations. If you choose to have your browser refuse cookies, some areas of our Sites may not function properly.
- **Do Not Track.** Your browser may allow you to set a Do Not Track (DNT) signal indicating that you do not wish your online activity to be tracked. Note, however, there is no industry consensus as to what site and app

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App. You can also reset your device and at any time through your device settings, which is designed to allow you to limit the use of information collected about you.

Please be aware that if you disable or remove Tracking Technologies some parts of the Platforms may not function correctly.

### C. Analytics and Behavioral Advertising.

Our Sites use third party tools such as Google Analytics, Facebook, YouTube and Vimeo. These third party tools collect data through Tracking Technologies such as cookies, which may be used in accordance with their privacy policies. Please refer to the privacy policies of these third parties to learn more about their practices and available opt-outs.

For Google Analytics, you can find their opt-out by visiting: <https://tools.google.com/dlpage/gaoptout?hl=en-GB> and downloading the Google Analytics Opt-Out Browser Add-on.

Where we work with third parties to engage in behavioral advertising, these third parties are often members of the Digital Advertising Alliance ("DAA") and/or the Network Advertising Initiative ("NAI"). These programs offer centralized locations where users can make choices about the use of their information for behavioral advertising. To learn more about the DAA's Self-Regulatory Program for Online Behavioral Advertising and your opt-out options for their members, please visit (i) for website opt-out, <https://www.aboutads.info/choices>; and (ii) for mobile app opt-out, <https://www.aboutads.info/appchoices>. To learn more about the NAI and your opt-out options for their members, please visit <https://www.networkadvertising.org/choices/>.

Please note that any opt-outs only apply to the specific browser or device from which you opt-out. Further, opting-out through the DAA or NAI only means that the selected members should no longer deliver certain behavioral advertising to you, and does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their practices or programs.

### D. Communications.

• **E-mails.** You may opt out of receiving promotional emails from us at any time by contacting us as described in the [How Do I Contact Budge Studios?](#) section below or by using the unsubscribe mechanism included in the email communications you receive. Please note that you cannot opt-out of non-promotional emails, such as those about your transactions, servicing, or Budge Studios' ongoing business relations.

• **Local or Push Notifications.** If you have opted-in to receive local or push notifications on your device, you can opt-out at any time by adjusting the permissions in your device or uninstalling our app. In Child Directed Apps, Budge Studios only uses local notifications.

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## E. Your Californian

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and affiliates' own direct marketing purposes. Under the law, a business should either provide California customers certain information upon request or permit California customers to opt in to, or opt out of, this type of sharing.

If you are a California resident and wish to obtain information about our compliance with this law, please contact us as set out in the [How Do I Contact Budge Studios?](#) section below. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that Budge Studios is not required to respond to requests made by means other than through the provided email address or mail address.

## F. Your European Privacy Rights.

Data subjects in Europe have additional rights as set out in the [What Should I Know as a Data Subject in Europe?](#) section below.

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## 10. HOW DOES BUDGE STUDIOS PROTECT INFORMATION?

We maintain reasonable and appropriate safeguards designed to help protect the security, integrity, accuracy and privacy of the information you have provided. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

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## 11. DOES BUDGE STUDIOS TRANSFER INFORMATION INTERNATIONALLY?

Our Platforms are operated in Canada, and the information we collect is governed by Canadian law. If you are accessing the Platforms from outside of Canada, please be aware that information collected through the Platforms will be transferred to, processed, stored, and used in Canada, the United States, and other jurisdictions. Data protection laws in Canada may be different from those of your country of residence. Your use of the Platforms or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in Canada, the United States, and other jurisdictions as set out in this Privacy Policy. If your data is collected in Europe, we will transfer your personal data subject to appropriate safeguards, including standard contractual clauses.

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## 12. HOW DO I CONTACT BUDGE STUDIOS?

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**By mail:**

Budge Studios

Attention: Data Privacy

5455, De Gaspé Avenue, Suite 340

Montreal, QC, H2T 3B3, Canada

**By email:**

[privacy@budgestudios.com](mailto:privacy@budgestudios.com)

**ESRB:**

For complaints, you can also contact ESRB Privacy at ESRB Attn: Privacy Certified Program, 420 Lexington Avenue, Suite 2240 New York, New York 10170, by email at [privacy@esrb.org](mailto:privacy@esrb.org), or directly through their consumer hotline.

**Data Subjects Located in the EU:**

For European specific requests, you can use any of the methods above or as further specified in the [What Should I Know as a Data Subject in Europe?](#) section below.

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### 13. WHAT SHOULD I KNOW AS A DATA SUBJECT IN EUROPE?

#### A. Budge Studios is a Data Controller.

Data protection laws in Europe make a distinction between organizations that process personal data for their own purposes (known as “controllers”) and organizations that process personal data on behalf of other organizations (known as “processors”). Budge Studios acts as a controller with respect to personal data collected as you interact with our apps, websites, emails, and advertisements.

#### B. Budge Studios has a Lawful Basis for Processing.

Data protection laws in Europe require a “lawful basis” for processing personal data. Our lawful bases include where: (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers or partners; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests. We retain personal data for as long as necessary to fulfill the purpose for which it was collected, or for other legitimate purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements.

#### C. Your European Privacy Rights.

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We have updated our Privacy Policy. Prior to navigating this website, we strongly encourage you to review it [here](#). By continuing your use of this website, you agree to the Privacy Policy. For any questions, contact us at [privacy@budgestudios.com](mailto:privacy@budgestudios.com)

I Accept



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You may exercise your rights by submitting a written request to us at the address set out in the [How Do I Contact Budge Studios?](#) section above. We will respond to your request within 30 days. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

#### D. Children in Europe.

Where the basis for our processing of personal data from children under 16 in Europe is consent, we will make appropriate efforts to verify that consent is given or authorized by the holder of parental responsibility over those children, and, if we learn or have reason to suspect that we have collected personal data from those children without parental consent, we will promptly delete it. If you are a child under 16 in Europe, please speak with your parent or guardian about this Privacy Policy so you can better understand how we use your personal data.

#### E. Complaints.

If you have a complaint about our use of your personal data or response to your requests regarding your personal data, you may submit a complaint to the data protection regulator in your jurisdiction. We would, however, appreciate the opportunity to address your concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us.

In addition to the contact information above, please contact our Data Protection Officer at [dpo@budgestudios.com](mailto:dpo@budgestudios.com)

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