# Privacy Policy for “Swerve Central”

Last updated: May 19, 2025

This Privacy Policy describes how Swerve Central, developed and published by [Your Company Name] (“we,” “us,” or “our”), collects, uses, discloses, and safeguards personal information from users (“you” or “Users”) of our mobile game Swerve Central (the “Game”). We are committed to protecting the privacy of all our Users, particularly those aged 13 and over, in compliance with applicable laws and platform requirements, including the Children’s Online Privacy Protection Act (COPPA), the General Data Protection Regulation (GDPR), and Google Play’s Developer Policies.

## 1. Scope & Acceptance

By downloading, installing, or using the Game, you agree to this Privacy Policy. If you do not agree with our practices, please do not use the Game.

## 2. Information We Collect

2.1. Information You Provide Directly  
- Account Information: Username, email address, password (if you choose to create an account).  
- Support Requests: Content of your messages when you contact customer support.

2.2. Automatically Collected Information  
- Device Information: Device model, operating system version, unique device identifiers (e.g., Advertising ID on Android, Identifier for Vendors (IDFV) on iOS).  
- Usage Data: Gameplay metrics (levels completed, scores, session length), in-game events, crash reports, log files.  
- Analytics Data: Collected via third-party analytics providers (e.g., Google Analytics for Firebase).

2.3. Third-Party Data  
- Advertising & Monetization: We may use third-party ad networks (e.g., AdMob). Such networks may collect or receive data about your interactions with ads served within the Game.

## 3. Legal Basis for Processing

- Consent: For optional features (e.g., push notifications, targeted advertising), we obtain your consent.  
- Performance of a Contract: To operate the Game and provide you with gameplay experiences.  
- Legitimate Interests: For fraud prevention, debugging, analytics, and improving our Game.  
- Compliance with Law: To comply with legal obligations (e.g., age verification under COPPA).

## 4. Use of Information

We use your information to:  
1. Operate, maintain, and enhance the Game’s features and functionality.  
2. Provide support, troubleshoot issues, and analyze trends.  
3. Serve relevant advertisements and offers, with your consent.  
4. Comply with legal obligations (e.g., responding to lawful requests, age verification).  
5. Protect against fraud and misuse of the Game.

## 5. Disclosure of Information

We may share information with:  
- Service Providers: Third-party vendors who perform services such as analytics, advertising, hosting, payment processing.  
- Ad Networks: To serve in-game ads, subject to your consent for targeted advertising.  
- Affiliates: Within our corporate family for internal operational purposes.  
- Legal Authorities: When required by law, regulation, or legal process.  
- Business Transfers: In connection with a merger, acquisition, or sale of assets.  
  
All third parties are required to maintain the confidentiality of your information and may only use it for specified purposes.

## 6. Children’s Privacy (Aged Under 18)

- Target Audience: We target Users aged 13 and over.  
- COPPA Compliance: We do not knowingly collect personal information from children under 13.  
- If we become aware that we have inadvertently collected personal information from a child under 13, we will delete it as soon as possible.  
- Parents or guardians may contact us at the address below to request deletion of their child’s personal information.

## 7. Your Rights & Choices

7.1. Access & Correction  
You may access, review, correct, or delete your personal information by contacting us at the email address below.  
  
7.2. Data Retention  
We retain personal information only as long as necessary to fulfill the purposes set out in this Privacy Policy, comply with legal obligations, resolve disputes, and enforce our agreements.  
  
7.3. Opt-Out  
- Marketing Communications: You may opt out of marketing emails by following the unsubscribe link in any email.  
- Targeted Advertising: You can disable interest-based ads via your device settings (e.g., limit Ad Tracking on iOS or Opt-out of Ads Personalization on Android).  
  
7.4. GDPR-Specific Rights (EU Residents)  
If you reside in the European Economic Area, you have the right to:  
- Request access to your personal data.  
- Rectify inaccurate or incomplete data.  
- Erase your personal data (“right to be forgotten”).  
- Restrict processing of your data.  
- Object to processing.  
- Data portability.  
- Lodge a complaint with a supervisory authority.

## 8. Security

We implement reasonable administrative, technical, and physical safeguards to protect your personal information from unauthorized access, use, or disclosure. However, no internet transmission is completely secure; we cannot guarantee absolute security.

## 9. International Data Transfers

Your information may be transferred to, stored, and processed in countries other than your country of residence. We will take steps to ensure that adequate safeguards are in place to protect your personal information, in compliance with applicable data protection laws.

## 10. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. We will post the updated policy with a new “Last updated” date. Significant changes will be notified to you by game update notifications or via email.

## 11. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us:  
  
Sean Emeka-Ugwuadu  
Email: sean.emekaugwuadu@yahoo.com  
Address: Colchester, United Kingdom

## Google Play Requirements & Compliance

- Declared all required permissions and data handling in the Google Play Console’s Data safety form.  
- Provide users with clear disclosures about the types of data collected and their purposes.  
- Adhere to Google Play’s Families Policy for Apps targeting children and families (https://play.google.com/about/privacy-security-deception/families/).  
  
By using Swerve Central, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.