

# PRIVACY POLICY

## Privacy Policy

is about applications and games published by Arcanum Games Limited.

Arcanum Games Ltd. is committed to protecting and respecting your privacy. We treat your personal data confidentially in accordance with the statutory data protection regulations and this Privacy Policy. We are the controller within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR").

By this Privacy Policy ("Privacy Policy") Arcanum Games specifies how Arcanum Games uses and protects any personal information that Arcanum Games collects from users of our website located at <https://arcanum.games/> (the "Website") and our web, mobile or computer games ("Applications").

We may receive your personal information from you or from our partners, through contracts or other legal arrangements you have with us or with our partners on behalf of us, in order to deliver contractual/legal obligations. In other cases, we will get that information from you with your permission and consent, or we may receive your personal information from third parties to which you have given consent to pass this information on to us.

This Privacy Policy is effective as of the Effective date and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on our Website.

This Privacy Policy does not apply to any websites, applications or services that do not display or link to this Privacy Policy or that display or link to different privacy policies.

### What data we collect?

We may collect information from you because we have a legal reason (allowed by law or under contract) to collect the information, or because you have consented for us to do so for a specific purpose.

#### 1.1. Information you provide to us:

For registration and authorization purposes of our Applications you will have to provide the following information and data:

Your Google Play ID;

Your e-mail;

Your photo, media and other files on your devices (if you permitted so);

Making and managing phone calls (if you permitted so)

#### 1.2. Information Received from Facebook:

When you access our Application by your Facebook account, you provide us with information from your Facebook account, as authorized by you and Facebook based on your privacy settings. This information may include:

Your Facebook ID;

Your friends list on Facebook;

Your name;

Your gender and birthday;

Your profile picture;

Taking pictures and recording video;

Information in your Facebook profile which you made publicly available;

Your location and the location of the devices you use to access Applications.

Please check Facebook's Privacy Policy and the available privacy settings and controls on Facebook to learn more about how you can control the information collected and shared with us through Facebook.

#### 1.3. Information Collected automatically:

Our Website and Applications may collect some data automatically, for example:

Browser type/ browser version;

Operating system used;

Referrer URL;

IP addresses;

Time of the server request;

Information about what type of device you use to connect to our Website or Application;

What parts of our Website you click on and how long you look at our Website;

Info about WiFi connection network and people connected to it;

Your location and the location of the devices you use to access Applications.

This information is necessary to enable you for use of our Website and Applications.

These data cannot be attributed to specific persons. This data is not combined with other data sources. The processing of this data for the above-mentioned purposes is required for the protection of our legitimate interests, namely the usability of our Website and Applications. You can limit the collection of some of the information through the standard privacy settings of the Internet browser or via settings of your device. We will delete this information as soon as it is no longer required for your use of our Website and/or Applications. This data is stored by us on our servers and is not passed on to third parties. We reserve the right to check this data at a later date if we become aware of specific indications of illegal use.

#### 1.3.1. By our Website:

Our Website collects cookies for authentication purposes to record log data. We use both session-based and persistent cookies, dependent upon how you use or interact with our Website.

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Most of the cookies we use are so-called "session-based cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your device until you delete them. These cookies enable us to recognize your browser the next time you visit our Website.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Website.

#### 1.3.2. By our Applications:

Our applications may also collect some data regarding your activity within the Applications, such as:

Information on your in-Application payments and in-game purchases;

Information on your in-game behavior.

1.3.3. By third party analytic software:

Our Website and Applications have integrations with third party software to collect extra data for analytics. The <https://app-measurement.com> method is used to collect analytics in firebase analytics and google play services.

1.4. Payment Information:

If you conduct paid transactions in the Game, you may be required to provide payment information, such as your credit card number, to our payment partners. We do not receive payment information you provide to our payment partners, and your payment information is subject to the payment partner's terms of use agreement and privacy policies, and not this Privacy Policy.

Why we collect personal information?

Arcanum Games collects information for the some or all of the following reasons:

For registration and authorization purposes in our Applications;

To keep your in-game progress after deleting and repeating installation of an Application;

Regarding your reference to our support service;

For the purposes of in-game behavior analyses and improvement of our Applications and indicating technical problems;

To charge in-game currency under your in-game payments;

To provide services to you under an agreement between you and Arcanum Games;

To provide information to you about our products and services if you have consented to receive it.

Legal basis for processing your information

Arcanum Games may process your information in case of:

We provide you services under an agreement between you and Arcanum Games ;

You have given us permission to do so;

Compliance with the law.

Who might we share your information with?

We may share your personal information with third parties, either because you have consented to allow us to do so or for legal reasons. For example, we may share your personal information with:

Our group companies, which means our subsidiaries, or our ultimate holding company and its subsidiaries;

Subcontractors and third parties for the purpose of providing you services under Application User License Agreement;

With third parties because you have given consent.

Data regarding your activity within the Applications (information on your in-Application purchases and information on your in-game behavior) can be shared with our partners for the purposes of in-game behavior analyses and improvement of our Applications, indicating technical problems and rendering add offers which allow you to receive in-game bounces.

If Arcanum Games or substantially all of our assets are acquired by a third party, personal data held by Arcanum Games about users of our Website and Applications will be one of the transferred assets of the company.

In addition, we will share your personal data with third parties for the following reasons:

If we must comply with a legal obligation;

To enforce or apply our Application User License Agreement, or other agreements;

To protect the rights, property, or safety of Arcanum Games, our customers or others;

We will exchange information with other companies or organizations to prevent fraud or to reduce our credit risks.

In order to combat illegal activities, we can provide data to government authorities at their request.

We may also disclose your data with your permission in order to comply with the requirements of the law or protect the rights and interests of our company or others.

How we use your personal information?

We use user data for gameplay analytics and statistics to analyze and enhance user experience.

We may also send you e-mails to notify about special events. You can refuse to receive our advertising messages, such as marketing e-mails, by following the instructions indicated in such messages.

Where we store your personal data?

We primarily store and process your personal data in the EU/European Economic Area (“EEA”). If we do transfer your personal data outside the EEA it will be because you have consented or because we have a legal reason to do so.

If your personal data cannot be processed within the EEA, we will:

Comply with all other data protection principles;

Where possible, be to a country that is on the list of the EU Commissions’ countries that provide adequate protections for the rights and freedoms of data subjects;

Make sure we have assessed the adequacy of protections in all other cases.

Since the legislation of different countries regarding data protection may differ from that adopted in your country, we take measures to protect your data. Such appropriate remedies used by our partners may include standard contract provisions approved by the EU Commission, as well as a Privacy Shield certificate (if the data is transmitted to the US).

Access to your stored personal data via password

Where we have given you (or where you have chosen) a password which enables you to access our Applications or certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Transmission and storage of your personal data

Unfortunately, the transmission of information via the internet is not completely secure. Although we use best practice to ensure your data is encrypted to the standard required in the GDPR to protect your personal data, we cannot guarantee the security of your data as it is transmitted and stored.

How long we keep your personal information?

We will not retain your personal information for longer than required.

We will keep your personal information:

For as long as required by law;

Until we no longer have a valid reason for keeping it;

Until you request us to stop using it.

For example, we keep your personal information which we received by Application, until such Application is operated by us. If we cease operation of an Application all your personal information collected by such Applications will be deleted by us. Although, we can keep your e-mail to send you information about our new services and Applications until you refuse to receive them.

We may keep just enough of your personal information to ensure that we comply with your requests not use your personal information or comply with your right to erasure. For example, we must keep your request to be erased even if it includes your personal data until such time as you are no longer our user.

What if I chose not to give you my personal information?

If the personal information is necessary for registration and/or use of our Applications and/or use functionality of our Website, then you will not be able to use our Applications and/or enjoy full functionality of our Website, we shall not be able to keep your in-game achievements after you delete the Application.

Links to Other Websites

From time to time our website may contain links to and from websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for any such policies. Please check these policies, where available, before you submit any personal data to these websites.

Children

We do not specifically collect or use data of persons under 16, nor do we consciously allow such persons to use our Website and Applications. If you are under 16 years old, do not use our Website and Applications and do not send us any information about yourself. If we become aware that we have collected data of persons under 16, we will delete such data as soon as possible.

If you believe that we have received any information from a child under the age of 16, contact us by email [info@arcanum.games](mailto:info@arcanum.games).

Your Rights

13.1 The right to be informed:

Arcanum Games is publishing this Policy to keep you informed as to what we do with your personal information. We strive to be transparent about how we use your data.

### 13.2 The right to access:

You have the right to access your information. Please contact us [info@arcanum.games](mailto:info@arcanum.games) if you wish to access the personal information Arcanum Games holds about you.

### 13.3 The right to rectification:

If the information Arcanum Games holds about you is inaccurate or not complete, you have the right to ask us to rectify it. If that data has been passed to a third party with your consent or for legal reasons, then we must also ask them to rectify the data. Please contact us if you need us to rectify your information: [info@arcanum.games](mailto:info@arcanum.games)

### 13.4 The right to erasure:

This is sometimes called 'the right to be forgotten'. If you want Arcanum Games to erase all your personal data and we do not have a legal reason to continue to process and hold it, please contact us: [info@arcanum.games](mailto:info@arcanum.games)

### 13.5 The right to restrict processing:

You have the right to ask Arcanum Games to restrict how we process your data. This means Arcanum Games is permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future. If you want us to restrict processing of your data, please contact us: [info@arcanum.games](mailto:info@arcanum.games)

### 13.6. The right to data portability:

Arcanum Games must allow you to obtain and reuse your personal data for your own purposes across services in a safe and secure way without this affecting the usability of your data. Please contact us if you want information how to port your data elsewhere: [info@arcanum.games](mailto:info@arcanum.games). This right only applies to personal data that you have provided to us as the data controller. The data must be held by us by consent or for the performance of a contract.

### 13.7. The right to object:

You have the right to object to Arcanum Games processing your data even if it is based on our legitimate interests, the exercise of official authority, direct marketing (including data aggregation), and processing for the purposeless of statistics. If you wish to object please contact us: [info@arcanum.games](mailto:info@arcanum.games).



### 13.8. The right to withdraw consent:

If you have given us your consent to process your data but changed your mind later, you have the right to withdraw your consent at any time, and Arcanum Games must stop processing your data. If you want to withdraw your consent, please contact us: [info@arcanum.games](mailto:info@arcanum.games)

### 13.9. The right to complain to a Supervisory Authority:

If you are of the opinion that we do not process your personal data in accordance with the statutory regulations, you have a right of appeal to a competent supervisory authority in accordance with Art. 77 of GDPR.

### Changes in this Privacy Policy

Arcanum Games reserves the right to update or change our Privacy Policy at any time and, where appropriate, we will notify to you about such changes. You should check this Privacy Policy periodically. Your continued use of the Website and Applications after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

### Contact information

All questions and claims regarding this Policy may be sent to our GDPR&Compliance Officer by e-mail: [info@arcanum.games](mailto:info@arcanum.games)

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