

# PRIVACY POLICY

The following information will give you an easy overview of what happens to your personal information when you play our games or use our website. Please read the definitions below to better understand how we process your data.

## DEFINITIONS

- Controller (“We”, “Us”): GameHunters S.A. with registered office in Warsaw, 00-712, Bluszczańska 76 PAW. 6.
- Personal data: information about a natural person identified or identifiable through one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, internet identifier and information collected through cookies and other similar technology.
- Policy: this Privacy Policy.
- GDPR: the 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.
- Website: the Internet site operated by the Controller at <https://gamehunters-studio.com/>.
- User (“You”): any natural person visiting the Website or using one or more services or functionalities described in the Policy.

## HOW DO WE COLLECT YOUR DATA?

We collect data when the Users provide it to us themselves, by using our services or visiting our Website. For example, this may be data the Users enter into a contact form or by registering for one of our services. Other data are collected automatically when Users download and use our games.

## WHAT PURPOSES DO WE USE YOUR DATA FOR AND WHAT IS THE LEGAL BASIS FOR THIS?

We use your data to provide you with access to our games and our services. For statistical and analytical purposes, we also collect information on how you use our services or play our games.

In connection with your use of the services (including the Website), we collect data to the extent necessary to provide the individual services offered, as well as information

about your activity on the Website. The following describes the specific principles and purposes of the processing of Personal Data collected during your use of the Website.

## **PURPOSES AND LEGAL BASIS OF DATA PROCESSING ON THE WEBSITE**

### **USING THE WEBSITE**

Personal data of all persons using the Website (including IP address or other identifiers and information collected through cookies or other similar technologies), are processed by the Controller:

- for the purpose of providing electronic services in terms of making the content collected on the Website available to Users; then the legal basis for processing is the necessity of processing for the performance of the contract.
- in order to possibly establish and assert claims or defend against claims; the legal basis of the processing is the Controller's legitimate interest in being able to defend its business interests.

The Users' activity on the Website, including their Personal Data, are recorded in system logs (a special computer programme used for storing a chronological record containing information on events and actions that concern the IT system used by the Controller for providing services). The information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes them for technical and administrative purposes, to ensure the security of the IT system and to manage it. In this regard, the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR) in providing and improving the functionalities offered to Users.

### **THE CONTACT FORM**

The Controller shall ensure availability through an electronic contact form. Using the form requires providing Personal Data necessary to contact the User and respond to the request. The provision of data marked as mandatory is required in order to receive and service the request, and failure to do so will result in the impossibility of service.

Personal data are processed:

- in order to handle an enquiry submitted via the contact form; the legal basis is the Controller's legitimate interest (Article 6(1)(f) of the GDPR) in being able to respond to the enquiries addressed to it.
- in order to possibly establish and assert claims or defend against claims; the legal basis of the processing is the Controller's legitimate interest in being able to defend its business interests.

## **SOCIAL NETWORKS**

The Controller processes the Personal Data of Users who visit the Controller's social media profiles (Facebook, Twitter). The data are processed in connection with running the profile, including for the purpose of informing the Users about the Controller's activities and promoting various events, services and products. The legal basis for the Controller's processing of Personal Data for this purpose is its legitimate interest in promoting its own brand.

## **COOKIES**

Cookies are small text files installed on the device of the User browsing the Website. Cookies collect information that facilitates using the Website, e.g., by storing the Users' visits to the Website and their actions.

### **“SERVICE” COOKIES**

The Controller uses the so-called service cookies primarily to provide the User with digital services and to improve the quality of these services. Therefore, the Controller and other entities providing analytical and statistical services to the Controller use cookies to store information or to access information already stored in the User's telecommunications terminal devices (computer, phone, tablet, etc.). Cookies used for this purpose include:

- Session cookies: these are stored on the User's Device and remain there until the session of the respective browser ends. The stored information is then permanently deleted from the Device memory. The mechanism of session cookies does not allow any personal data or any confidential information to be collected from the User's Device.
- Permanent cookies: these are stored on the User's Device and remain there until deleted. Ending the session of a given browser or switching off the Device does not remove them from the User's Device. The mechanism of permanent cookies does not allow any personal data or any confidential information to be collected from the User's Device.

### **MARKETING COOKIES**

The Controller and its trusted partners also use cookies for marketing purposes, among others in connection with directing contextual or behavioural advertising to Users. For this purpose, the Controller and trusted partners store information or access information already stored in the User's telecommunications terminal devices (computer, phone, tablet, etc.).

### **ANALYTICAL COOKIES**

The Controller uses so-called analytical cookies to improve the quality of services on the Website. Therefore, the Controller and other entities providing analytical and statistical services to the Controller use cookies to store information or to access information already stored in the User's telecommunications terminal devices (computer, phone, tablet, etc.).

## **THE PURPOSES OF USING COOKIES**

The Controller uses Own Cookies for the following purposes:

1. Service configuration, i.e.:
  - a. adapting the contents of the Website pages to User preferences and optimising the use of the Website pages.
  - b. recognising the Service Users' devices and their location and appropriately display the Website, tailored to their individual needs.
  - c. remembering the User's selected settings and personalizing the User's interface, e.g., with respect to the chosen language or region of origin of the User.
  - d. remembering the history of pages visited on the Website in order to recommend content.
  - e. font size, website design, etc.
2. Realisation of processes necessary for full functionality of Websites, i.e.:
  - a. adapting the content of the Website pages to User preferences and optimising the use of the Website pages. In particular, these files allow for recognition of the basic parameters of the Users' Devices and for proper display of the Website, adapted to their individual needs.
  - b. correct operation of the affiliate programme, enabling in particular the verification of the sources of redirection of Users to the Website.
3. Remembering the user's location:
  - a. correct configuration of selected functions of the Website, enabling in particular the adjustment of information provided to the Users with respect to their location.
4. Analysis, research and audience auditing:
  - a. creating anonymous statistics which help to understand how the Website users use the Website pages, which makes it possible to improve their structure and content.
5. Ensuring safety and reliability of the service

The service administrator uses Third-Party Cookies for the following purposes:

6. Collect general and anonymous statistical data through analytical tools:
  - a. Google Analytics [cookie administrator: Google Inc. with registered office in the United States]
  - b. Facebook [cookie administrator: Facebook Inc. with registered office in the United States or Facebook Ireland with registered office in Ireland]

- c. Steam [Valve Corporation, P.O. Box 1688, Bellevue, WA 98009  
European representative: Valve GmbH, Rödingsmarkt 9, D-20354  
Hamburg, Germany]
7. Use of interactive features to publicise the Website through social networks:
  - a. Facebook.com [cookie manager: Facebook Inc. based in the United States or Facebook Ireland with headquarters in Ireland]
8. Marketing of products and services offered by the Controller to Participants may use the marketing tools offered by Facebook or Google. Such tools allow, among other things, the Controller to compare the identifiers or assigned cookies installed by the Controller on the Website with the identifiers or cookies that are in the databases of these entities. In the case of confirming the coincidence of identifiers, users of the Facebook platform or those using the Internet may be displayed advertisements concerning the Controller's services. For more information on custom audiences, please visit the respective partner's Website.

Possibility of defining the conditions for storing Cookies or Cookies gaining access:

9. the User may, independently and at any time, change the Cookie settings, specifying the conditions for their storing and Cookies gaining access to the User's Device. The User may change the settings referred to in the previous sentence by means of the settings of the Internet browser or configuring the service. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the settings of the Internet browser or inform on their placement on the User's device each time. Detailed information about the possibility and methods of using cookies is available in the settings of your software (web browser).
10. The Users can delete Cookies at any time using the functions available in the web browser they are using.
11. Restricting the use of Cookies may affect some of the functionalities available on the Website.

## **INFORMATION ABOUT THE RESPONSIBLE ENTITY**

The responsible entity (referred to in the GDPR as the "Data Controller") is the natural or legal person who, alone or jointly with others, makes decisions about the purposes and resources for processing personal data (e.g., names, email addresses, etc.).

The controller of your personal data is:

**GameHunters S.A.**

**with registered office in Warsaw 00-712, Bluszczańska 76 PAW. 6.**

If you have any questions or suggestions regarding data protection or the exercise of your rights, you can email us at [policyprivacy@gamehunters-studio.com](mailto:policyprivacy@gamehunters-studio.com).

## **DATA DISCLOSURE**

In connection with the provision of services, Personal Data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems, the Facebook platform administrator and Google.

The Controller reserves the right to disclose selected information concerning the User to competent authorities or third parties who request such information on the basis of an appropriate legal basis and in accordance with the provisions of the applicable law.

## **USER DATA DELETION**

We will delete or anonymise your personal data as soon as it is no longer necessary for the purposes for which we collected or used it in accordance with the previous sections. We will generally keep your personal data for as long as you use the Website or for the duration of the contract, unless the data needs to be kept longer for legal reasons, for the purposes of criminal proceedings, or to secure, pursue or enforce legal claims, or is required to satisfy our legitimate interests, or until you successfully object to such processing.

## **AGE RESTRICTIONS**

To use our services, you must confirm full legal capacity or, in the case of limited capacity, obtain the consent of your legal guardian. We do not knowingly collect or ask for children's personal data. If you are unable to confirm full legal capacity, please do not send us any personal information, including your name, address or email address. If we become aware that we have collected a child's personal data, we will delete it as soon as possible. If you think we may have a child's data, please contact us at [policyprivacy@gamehunters-studio.com](mailto:policyprivacy@gamehunters-studio.com).

## **YOUR RIGHTS AS A DATA SUBJECT**

### **RIGHT TO INFORMATION**

At any time, upon request, you have the right to obtain information from us about your personal data within the scope of Article 15 of the GDPR. To request such information, you may submit a request by post or e-mail to the address above.

## THE RIGHT TO RECTIFY INACCURATE DATA

You have the right to request us to immediately correct any incorrect personal data concerning you. To do so, please use the contact addresses given above.

## RIGHT TO ERASURE

Under the conditions described in Article 17 of the GDPR, you have the right to request erasure of your personal data. Erasure of personal data will take place as soon as such data are no longer necessary for the purposes for which it was collected if an effective objection has been lodged or if erasure is mandatory under EU law or the law of a Member State to which we are subject. Information on the retention period can also be found in the “Retention of Personal Data” section of this Privacy Policy. To exercise the aforementioned right, please use the contact addresses provided.

## THE RIGHT TO RESTRICT PROCESSING

You have the right to request that we restrict the processing of your data in accordance with Article 18 of the GDPR. If this right is exercised, the Data Controller shall cease performing operations on the personal data, with the exception of operations to which the data subjects have given their consent, and storing them, in accordance with the retention rules adopted, or until the reasons justifying the restriction of processing cease to exist (e.g., until the supervisory authority issues a decision authorising further processing).

## RIGHT TO DATA PORTABILITY

On this basis, with regard to data processed by automated means in connection with the contract concluded or consent given, the Controller shall issue the data you have provided in a computer-readable format. It is also possible to request the data to be sent to another entity, provided that there are technical possibilities to do so on the part of both the Controller and the indicated entity.

## RIGHT TO OBJECT

Pursuant to Article 21 of the GDPR, you may object at any time to the processing of your personal data, on grounds relating to your particular situation, which is carried out on the basis of a legitimate interest of the Controller (e.g., for analytical or statistical purposes or on grounds relating to the protection of property); your objection in this respect should contain a statement of reasons.

Furthermore, you may object to the processing of your personal data for marketing purposes at any time, without having to justify such objection.

## RIGHT TO LODGE A COMPLAINT

You also have the right to lodge a complaint with the competent data protection authority, in particular in your EU Member State of habitual residence, place of work or the place where the alleged infringement was committed. The competent supervisory authority in Poland is:

### **The Office for Personal Data Protection**

Stawki 2, 00-193 Warsaw

[kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl)

## RIGHT TO WITHDRAW CONSENT

Where the processing of personal data takes place on the basis of consent given, the data subject shall have the right to withdraw the consent at any time, which shall not, however, affect the lawfulness of the processing carried out before the withdrawal of consent.

## SUBMITTING REQUESTS RELATING TO THE EXERCISE OF RIGHTS

All requests concerning the exercise of the above-mentioned rights of data subjects should be submitted:

- In writing to the Controller's address
- By e-mail to the following address: [policyprivacy@gamehunters-studio.com](mailto:policyprivacy@gamehunters-studio.com)

The request should, as far as possible, indicate precisely what is being requested, i.e., in particular:

- Which rights the applicant wishes to exercise (e.g., right to erasure, right to obtain a copy of the data).
- What process the request concerns (e.g., use of a specific service, activity in a specific application, receipt of a newsletter, etc.).
- What are the purposes for which the requested data are processed (e.g. marketing purposes, analytical purposes, etc.).



If the Controller is unable to identify the person making the request solely on the basis of the request made, the Controller will request additional information from that person. It is not compulsory to provide such data, but failure to do so will result in a refusal to comply with the request.

The request shall be answered within one month of receipt. If an extension of this period is necessary, the Controller shall inform the person making the request of the reasons for such extension.

## **DATA STORAGE**

The duration of data processing by the Controller depends on the type of service provided and the purpose of the processing in question. As a rule, the data shall be processed throughout the period of provision of the service or performance of the order until the moment of withdrawal of the consent or an effective objection to data processing in cases where the legal basis for data processing is the legitimate interest of the Controller.

The processing period may be extended if the processing is necessary for the establishment and assertion of possible claims or the defence against claims, and thereafter only if and to the extent required by law. After the end of the processing period, the data are irreversibly deleted and anonymised.

## **LIBERTY**

The provision of personal data to the Controller is generally voluntary. However, if you choose to use some of our services or games, the provision of personal data is mandatory. Without providing details, some services may not be available and the Controller will not be able to respond fully to your request.

## **AMENDMENTS TO THIS PRIVACY POLICY**

We reserve the right to amend this Privacy Policy as necessary in accordance with applicable data protection legislation. In this way, we will be able to adapt it to current legal requirements and take account of changes in our services, for example when introducing new services. The most up-to-date version always applies to your visit.

The current version of this Privacy Policy is always available at <https://gamehunters-studio.com/privacy-policy>