

PRIVACY POLICY

This privacy policy (hereinafter the „**Privacy Policy**”) is a document which determines terms and conditions on which ALL IN! GAMES (hereinafter, “the Company”) with registered office at 31-618 Kraków, os. Złotego Wieku 89, Poland, registered under number of the National Court Register 0000332655 corporate number Tax Identification Number: 679-301-20-52 may collect and process data (including personal data) concerning the users (“the User”) of the Game and/or any services related to the Game (i.e. websites, technical assistance/support, means of communication, customer services, complaints) (hereinafter the “**Services**”).

1. Personal Data and Anonymous Data

Personal data means any information relating to an to an identified or identifiable natural person (i.e. name/surname, e-mail address) (hereinafter the “**Personal Data**”). The Company applies highest standards as regards protection of confidential information and personal data, including those which are resulting from European general data protection regulation (GDPR).

The Company may also process anonymous data which does not allow the identification of the given User, however allows to produce, generate and analyse statistics as regards groups (i.e. patterns, habits, popularity, interface usage statistics) (hereinafter the “**Anonymous Data**”). The Anonymous Data may be aggregated and shared with other third parties (i.e. match history, game stats or others).

2. The User

The User is a natural person who uses the Services provided by the Company. The Personal Data of persons under age of 16 are subjected to particular protection, in particular its collection may require obtaining consent of statutory agent (e.g. parent, legal guardian). In the event that the Company obtains the Personal Data of the User under age of 16 in an unaware or uncommitted manner, the Company after receiving information in that respective area shall take all necessary legal actions (e.g. upon request of statutory agent).

3. Basis for collecting and processing Personal Data

Use of specified Services provided by the Company (e.g. games, support, events) requires obtaining by the Company given Personal Data, without which the User may not be allowed to use of such Services. The Company collects Personal Data solely in the scope necessary for provision of such Services, whereas in the remaining scope only upon separate consent of the User (e.g. marketing, newsletter). The Company does not collect Data beyond justified needs and adequacy (rules of so called “minimalism” – collecting Personal Data solely in the scope necessary for realization of legally specified purpose). The Company processes Personal Data in a manner consistent with binding regulations (based on legal regulations binding on the territory of European Union or Member State Law).

The Company may collect and process for the following reasons and on the following basis: **(i)** the User has given consent to the processing of his/her Personal Data for one or more specific purposes, **(ii)** processing is necessary for the performance of a contract to which the User is a party in order to perform such contract by the Company or in order to take steps at the request of the User prior to entering into a contract, **(iii)** processing is necessary for compliance with a legal obligation to which the Company is subject and **(iv)** processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party (i.e. the User), except where such interests are overridden by the User’s legitimate interests and rights.

The Company during collection of the Personal Data follows rules of so called “minimalism” (the Company does not collect any Personal Data beyond justified needs) and adequacy (the Company collects the Personal Data solely in the scope necessary for realization of legally specified purpose).

The Company collects the Personal Data concerning the User in the following way: (1) submitted by the User in connection with the Services provided by the Company (e.g. game delivery), (2) submitted by the User upon contact with the Company connected to provided Services (e.g. complaints, questions), (3) submitted within the scope of technical assistance as regards the Services (e.g. support), (4) collected automatically in connection with activity of the User (e.g. cookies files), (4) collected upon separate consent of the User (e.g. marketing, newsletter, testing, events, questionnaires).

4. Type of the Personal Data collected by the Company

Depending on the type of the Services and/or the Game, the Company uses one or more information and the Personal Data concerning the User: (1) name/surname, (2) e-mail address, (3) phone number, (4) residence address and correspondence address, (5) name of users (e.g. forum, digital platforms or others used for provision of the Services and/or communication with the Company), (6) IP address, (7) technical information as regards devices and informatic tools used by the User in connection with the Services (e.g. IP, type of devices, web browser), (8) information submitted in connection with technical assistance provided by the Company in the scope of support and customer services (e.g. parameters, logs, descriptions), (9) information connected to participation in events organized by the Company (e.g. contests, events) in the scope necessary for participation in such events, (10) other information connected with use of the Services provided by the Company. The scope of collected information and the Personal Data depends on type of the Services which are used by the User, as well as the scope of voluntary consents granted by the User to the Company.

5. Safety of the Personal Data

The Company applies all required by law (binding on the territory of European Union or Member State Law) security measures as regards the Personal Data. As a rule, the Personal Data are stored in the Company’s registered seat or on a protected server on the territory of European Union. In cases when due to a type of cooperation with partners the Personal Data are transferred outside the territory of European Union (European Economic Area), the Company applies all legal (e.g. agreements) and technical measures necessary for safety of the Personal Data processing.

6. Transfer of the Personal Data

Ensuring the highest quality of the Services provided by the Company, the Company may be entailed with transfer of the Personal Data to third parties - so called “processors” - which is based on an appropriate processing agreement concluded between the Company and such partner. The Company transfers the Personal Data solely in the scope and for the purpose necessary for realization of aim agreed with such partner, applies all required legal and technical measures as regards protection of the Personal Data and cooperates solely with reliable and professional partners. The Company also cooperates with entities which provide services connected to day-today functioning of company (e.g. legal advisors, tax advisors). The Company shall also make available the Personal Data to entities which are entitled to such access upon separate binding legal regulations (e.g. administrative bodies).

7. The Users’ rights

The User at any time is entitled to exercise of the right to object (forbid) as regards processing of his/her Personal Data, as well as use other type of rights concerning obtaining information or protection, in particular the User have the right to: (1) access to the Personal Data, (2) request to rectify, correct or delete the Personal Data, (3) request to restrict the processing of the Personal Data, (4) request to transfer the Personal Data to another entity, (5) submit complaint to a data protection authority - President of the Data Protection Office or other offices.

However, in some cases exercising one or more of the mentioned rights may result in limitation of possibility of use by the User of one or more the Services provided by the Company in which processing the Personal Data is required. Similarly, the Company may be obliged to store (keep) the Personal Data upon binding law regulations. In each case the User who exercised on of his/her rights shall receive a proper response from the Company with indication of activities and their justification.

8. “Automatic profiling” and “ordinary profiling”

The Company does not apply so called “automatic profiling” being a decision based solely on automated processing and which produces legal effects concerning the User (e.g. use of algorithm which exams behave in games or on social platforms and which produces decision without use of so called “human factor”).

The Company may apply so called “ordinary profiling” this is evaluation of certain personal aspects to natural persons in order to prepare individual commerce offer with use of so called “human factor” in such evaluation (e.g. offer connected to a game or DLC). At any time and without stating any reasons the User is entitled to exercise of the right to object (forbid) any type of profiling by the Company. At any time and without stating any reasons User is entitled to exercise of the right to object (forbid) any type of profiling by the Company, subject to the point 7 “Users’ rights”.

9. Cookie Files

The User uses cookies technology during using websites owned by and/or administrated by the Company (hereinafter the “**Websites**”). Cookie file is type of information which the Company’s network server sends to the User’s computer or device upon accessing to the Websites. The Company uses or may use cookies files as follows: 1) session files - in order to use technical data saved during use of the Websites and transfer to other sites as well as to use such technical data to improve use of the Websites. Such file shall not contain any personal data allowing to identify the User and exits solely during given sessions of using the Websites, 2) log files and multiple use files which may be installed on the User’s computer during login on the Websites in order to save data for the purposes of such login (if applicable). Such files may be used solely for comfort of the User in order to avoid further information introduction and verification during following logins. Such file is stored on the User’s computer for an indefinite period of time, even after leaving the Website. For verification of cookies files please check settings in your website browser. Limitation of use of cookies files or its settings may influence the scope of use of the Websites by the User. If cookies files are blocked by the User, most content of the Websites shall be still available, however particular functionalities may not be available to the User (i.e. registration).

The Company does not allow to install any cookies files by third parties on the User’s computer with use of the Websites. The Company is not responsible for content or privacy policies of external websites administrated by third parties.

The Websites use Google Analytics which is a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on visitors' computers,

to help the website operators analyse how visitors use the site. The information generated by the cookie about the visitors' use of the website will generally be transmitted to and stored by Google on servers in the United States. For more details please see Google Analytics and Google privacy policy.

10. Additional informations

Use of the Company's Services may require use of the external websites and/or devices (i.e. distributors, Steam, consoles, PS4 Store). The Company is not responsible for content and/or privacy policies of external websites administrated by third parties or services provided by such third parties.

The Company stores (keeps) the Personal Data solely for the period necessary for obtaining purpose for which the Persona Data are being collected (e.g. performance of agreements, technical support). However, in some cases binding regulations or content of legal obligations requires that the Company is obliged to store (keep) the Personal Data for a longer period ("data retention"). The above may concern settlement and tax issues or performance by the Company other obligations resulting from biding regulations. In each case such data retention by the Company is based on appropriate legal base, this is consent of User or binding provision of law.

Use of the Services and the Game by the User requires acceptance of this Privacy Policy.

The User is allowed to contact with the Company throughout e-mail address: privacy@allingames.com and/or by traditional post on address: All in! Games Sp. z o.o. z Kraków (31-618), os. Złotego Wieku 89.