

Who is the administrator of your personal data?

Ten Square Games S. A. with its registered office in Wrocław, ul. Jana Długosza 60 (51-162) (“**Ten Square Games**”) is the administrator of your personal data collected in relation to your use of an on-line game (“**The Game**”). This means that Ten Square Games is responsible for ensuring that your data are used in a safe manner as well as in compliance with the Agreement and applicable laws. Should you have any questions about the processing of your personal data, please contact us via e-mail: support@tensquaregames.com or by sending a letter to the address written above. You can also contact our Data Protection Officer via e-mail: dpo@tensquaregames.com.

For what purpose and on what grounds do we process your personal data?

Your personal data collected by us in relation to your use of the Game are processed for the following purposes:

1. **Conclusion and performance of the Agreement** for rendering services of the Game. Your data are processed in particular for you to be able to sign up and use the Game (legal basis: section 6(1)(a) of GDPR, hereinafter referred to as “performance of the Agreement”) – for the duration of the Agreement.
2. **Performance of our legal obligations**, including:
 - a. Issuing and storing invoices and keeping accounting records,
 - b. Investigating complaints and returns in form and within time defined in legislation,

(Legal basis: section 6(1)(c) of GDPR, hereinafter referred to as “legal obligations”).

Data necessary for the performance of our legal obligations will be processed for the duration of these obligations, i.e.:

- a. for the period during which we are obliged to issue invoices and during which, according to tax regulations, we are obliged to keep accounting records,
- b. for the period during which complaints can be made,

or, to the extent related to the data on your actions in the Game, for the duration of the Agreement for rendering services with the purpose of granting you easy access to your Game history.

Should you decide to share with us details about complaints not resulting from applicable provisions, such data will also be processed in order to tailor our offer to the needs of our Customers – for the period essential for the performance of this task (legal basis: section 6(1)(f) of GDPR, hereinafter referred to as “our legally justified interest”).

Your data will also be processed in order to prove that we have diligently performed our legal duties – for the period during which we may be held responsible for non-performance, e.g. by means of a financial penalty imposed on us by a state authority (our legally justified interest);

3. **determining, defending, making claims** – for the period after which claims (e.g. arising out of the Agreement) fall under the statute of limitations or for the duration of potential proceedings (legal basis: our legally justified interest);
4. **contacting Ten Square Games** – for the period during which it is necessary to correspond with you (e.g. via a contact form or e-mail) and to determine, defend and demand potential claims arising out of the correspondence (legal basis: our legally justified interest or, depending on the content of the correspondence, actions taken on your demand, before a potential agreement is entered);

5. **Direct marketing** including sending commercial information and marketing materials via e-mail (if you consent to such actions), awarding bonuses and other benefits, tailoring content displayed in the Game to your preferences and interests – for the duration of the Agreement for rendering services or until you object to your data being processed for this purpose – on the condition that it had been expressed before the Agreement was terminated (legal basis: our legally justified interest);

Do we process your data automatically (including by means of profiling)?

The analysis of your behaviour helps us better understand your habits and expectations as well as tailor our offer to your needs. In order to grant you access to personalised offers and other benefits, all tailored to your preferences, Ten Square Games shall profile, i.e. automatically analyse, your data and behaviour, and on that basis make automatized decisions (e.g. on whether to make you a given offer or not). By letting us take such actions you get access to personalized offers and individual benefits. Due to our use of advanced technologies, special offers and information on them will often be developed and sent to you automatically by our system. Thanks to that they will be more up to date, while you will have the opportunity to familiarize yourself with their content as soon as possible. The legal basis for such a type of data processing is the binding Agreement for rendering services (performance of the agreement) and our justified interest.

What data do we process?

For the duration of the Agreement and the period during which you use the Game, we come into possession of your other data, in particular the ID of your mobile device [___], the data related to the content you view or goods you purchase, which is the consequence of you using our services and us using cookie files and analytical tools. Thanks to this technology Ten Square Games, as a data administrator, will store information and be granted access to information on your actions in the Game in order to tailor their advertisements and services to your preferences, to assess some of the information about you as part of automatized personal data processing (profiling), run market and statistical analyses and improve the quality of information displayed in your browser.

Who do we share your data with?

We might share your data with entities supporting us in our current dealings related to our administration of the Game. These might be:

- a. companies from a corporate group, in particular TEN SQUARE GAMES S.A., PLAY COOL ZOMBIE GAMES SP. Z O.O., TINY DRAGON ADVENTURE GAMES SP. Z O.O., FAT LION GAMES SP. Z O.O., PANGOLINS GAMES PRIVATE LIMITED,
- b. marketing agencies and other entities supporting us in our marketing activities,
- c. external providers of IT services (including IT systems),
- d. entities supporting us in dealing with correspondence,
- e. entities providing us with consultation, advice and audit services as well as legal, tax or fiscal support,
- f. entities offering postal or delivery services,
- g. operators of on-line payment platforms,
- h. entities co-operating with us in sales,

Do your data cross the boundaries of the European Economic Area (EEA)?

Your data might be shared with our partners outside of the European Economic Area but only to a necessary extent in which our partners provide us with services, in particular marketing services and services which support the functionalities of the Game.

Our partners might be located in the US and Canada. The security of your data is ensured by our security systems, including, among others, standard clauses accepted by the European Commission. We do our best to make sure that our partners are UE-USA Privacy Shield certified. Your data transferred to Canada is further secured by a decision of the European Commission, according to which Canada ensures an accurate level of data security. You are entitled to receiving a copy of protection of your data transferred to these countries; all you have to do is to contact us by one of the means listed above.

What are your rights?

In relation to our processing of your data you have the right to access your data, the right to rectify your data, the right to delete your data, the right to limit the processing of your data and the right to move your data to another place. You have the right to object to your data being processed for the purposes of direct marketing.

Should you conclude that your data is processed in breach of regulations, you have the right to lodge a complaint with a competent data protection authority.