

## Information on data processed by Ten Square Games S.A.

### 1. Who is the administrator of your personal data?

The company Ten Square Games S.A, with its registered office in Wrocław, ul. Jana Długosza 60 (51-162), hereinafter referred to as “**Administrator**” or “**TSG**”, is the administrator of personal data (hereinafter referred to as “**Data**”) processed by us in relation to our business.

The administrator has appointed a Data Protection Officer (hereinafter referred to as “**DPO**”), whom you may contact by sending a letter to the above-mentioned address or by sending an e-mail to: [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com)

TSG is part of TSG Corporate Group. The following companies are all part of TSG Group:

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.

The Data is processed in compliance with applicable laws, including GDPR<sup>1</sup>.

Data is defined as all information about an identified or identifiable natural person. An identifiable natural person is a person who might be directly or indirectly identified, in particular on the basis of an identifier like a name and surname, an ID number, localization data, Internet identifier or one or a few specific details defining a physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person.

### 2. How do we process Data?

TSG spare no effort in protecting interests of persons, to whom the Data is related, and in particular ensures that the collected Data is:

- processed in accordance with applicable law and in a way that is clear for the person to whom the Data is related;
- collected for specific, clear and legally justified purposes and it is not further processed in a way non-compliant with these purposes;
- adequate, appropriate and limited to necessary purposes for which it is processed;
- correct and updated when necessary;
- stored in a way making it possible to identify the person to whom the Data is related, for time no longer than crucial to meet the objectives of the Data processing;
- processed in a way ensuring appropriate Data security, including securing the Data against an unauthorised or illegal processing and incidental leakage, destruction or damage, within all of our technical or organizational means.

### 3. When do we process Data?

We process Data in many different situations. We might process your Data if you shared it with us directly or by means of other communication media (e.g. by applying, making an e-mail or phone inquiry/offer) or during our cooperation when you concluded or performed an agreement or in relation to fulfilling functions / responsibilities under generally applicable law regulations (e.g. for the purpose of making lists / registration of shareholders) but also in cases where we acquired your Data from other sources (e.g. from a company with whom you cooperate and who at the same time are our client/contracting party).

---

<sup>1</sup>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

#### **4. Processing Data in relation to business and contact.**

##### **a. What data do we process in relation to business and contact?**

As the Administrator we process Data of our business partners (investors, contracting parties), their plenipotentiaries, employees/partners, Data of other persons shared with us under agreements as well as other persons who contact us by phone or e-mail.

We may process the following Data in relation to our business and contact: ID Data, contact details, Data relating to their job and qualifications as well as other Data shared with us in relation to our cooperation or contact.

The above-mentioned Data is sourced directly from persons to whom it belongs, but also from other entities, like their employers/contractors.

##### **b. What is the aim of and legal basis for processing Data in business and contact?**

The Data may be used for the following purposes related to business and contact:

- establishing cooperation;
- entering and performing an agreement;
- settling contractual payments;
- answering all questions, investigating applications or corresponding with/contacting persons on these matters
- marketing and contacting persons in relation to other information and services rendered by TSG;
- defending from any potential claims and making claims;

The basis for Data being processed by TSG is:

- performance of an agreement or taking action before an agreement is entered, on demand of a person, to whom the Data is related;
- fulfilling legal obligations imposed on the Administrator;
- legally justified interest of the Administrator reflected in Administrator's or third party's product marketing, services or contact, including correspondence and defence from any potential claims.

Sharing one's Data is voluntary, however it might be necessary for entering or performing an agreement or for answering asked questions or for corresponding.

##### **c. How long will the Data be processed in business and contact?**

The Data collected for the purpose of entering and performing an agreement will be processed through the duration of the agreement, and, after the agreement has expired, until potential claims fall under the statute of limitations.

The Data of persons who contacted TSG will be processed for the period necessary for answering and receiving correspondence, and later until potential claims fall under the statute of limitations.

##### **d. Who is the receiver of data in business and contact?**

Data processed by us in relation to business and contact might be shared with other companies in TSG Group, our business partners and other contracting parties supporting us in work organization, IT services, marketing, organizing conferences as well as entities providing us with consultation, advice and audit services as well as legal, tax or fiscal support.

## **5. Data processing in recruitment**

### **a. What Data do we process in recruitment?**

As the Administrator we process Data of persons applying for a job by means of all accessible recruitment platforms, including in particular Data shared by an app or in the course of recruitment.

The following kinds of Data might be processed in recruitment (processing some of that Data might be dependent on your consent): ID Data, contact details, Data on your education, Data on skills and employment to date, Data on qualifications and other Data shared with us in the process of recruitment.

### **b. What is the aim of and legal basis for processing data in recruitment?**

The Data related to recruitment might be processed for the following purposes:

- considering applications and leading the recruitment and for future recruitment or recruitment within TSG Group, if consent is given;
- defending from any potential claims and making claims;

The basis for Data being processed by the Administrator are applicable laws, in particular the Labour Code and implementing acts and, within the scope broader than defined in the aforementioned legislation and within the scope of future recruitment, your consent.

Sharing your Data is voluntary, however necessary for the recruitment process and potential further cooperation.

### **c. How long will the Data in recruitment be processed?**

The Data will be processed for the aforementioned purposes for the duration of the recruitment process or for the duration of future recruitment, and further until potential claims fall under the statute of limitations.

### **d. Who is the receiver of Data in recruitment?**

The Data processed by us in recruitment might be shared with other companies in TSG Group as well as entities supporting us in recruitment and rendering for us IT services.

## **6. Processing Data of shareholders and proxies**

### **a. What kind of Data of shareholders and proxies do we process?**

As the Administrator and at the same time public company, we process Data of shareholders of the company and their proxies: identification Data, contact Data and other Data shared with us by shareholders and proxies in relation to their status and executing rights and obligations under generally applicable law regulations including in relation to partaking of shareholders and proxies in the General Meeting of Shareholders of the Company.

### **b. What is the basis and purpose of processing Data of shareholders and proxies?**

Data of Shareholders and their proxies are processed:

- To fulfil obligations under generally applicable law regulations including in particular referring to answering queries or applications directed at the Company, correspondence / contact in this regard, making registers / lists of shareholders, other essential documentation;
- To defend from potential legal claims and also to raising potential claims.

The legal grounds for processing Data by the Administrator are legal obligations imposed on the Administrator resulting in particular from the regulations of the Commercial Companies Code, the Polish Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading and Public Companies and of the Regulation (EU) of the European Parliament and the Council

of the Market Abuse Regulation (MAR).

Sharing Data is voluntary yet essential to fulfil rights of shareholders under generally applicable law regulations.

**c. How long will Data of shareholders and proxies be processed?**

Data of shareholders and proxies will be processed for the period necessary to fulfil obligations under generally applicable law regulations and next until the expiry of limitation period of any legal claims.

**d. Who is the recipient of Data of shareholders and proxies?**

Data of shareholders and proxies processed by us may be shared with our clients/ contracting parties who support our workflow, IT services, marketing, correspondence handling and offer advisory, consultative and auditing services as well as legal, tax or accounting advisory.

**7. Does 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.

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.

**8. What are your rights?**

According to applicable laws you have the right to:

- access the Data and obtain a copy of it;
- demand their rectification, deletion or demand their processing be limited;
- object Data processing;
- move the Data to another administrator (to the extent in which the basis for data processing is your consent or its necessity for the performance of an agreement).

If Data is processed on the basis of consent, you have the right to withdraw your consent in any moment without affecting the legality of processing that had taken place on the basis of the consent until it has been withdrawn.

You always have the right to lodge a complaint with the President of Data Protection Authority.

**9. Contact:**

Should you have any questions related to the processing of your Data, please contact our DPO available at [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com) or the address written above.