

PRIVACY POLICY

OF

TEN SQUARE GAMES

Thank you for playing the games of Ten Square Games.

This Privacy Policy explains what data we collect when you visit Ten Square Games Services, the ways we might use it, as well as the choices you have about your personal data which we process.

This Privacy Policy applies to Ten Square Games' S.A., headquartered in Wrocław, Poland, and its subsidiaries': Play Cool Zombie Sport Games sp. z o.o., Tiny Dragon Adventure Games sp. z o.o., Fat Lion Games sp. z o.o. (hereinafter together referred to as "Ten Square Games") mobile and online services in the form of our mobile and web-based applications, our website (www.tensquaregames.com) and its subdomains, our presence on third party websites (e.g., Facebook) and other platforms, websites, products, offers and services that we offer from time to time, all of which together we refer as "Services" or the "Service".

This Privacy Policy does not apply to third parties we do not own or control, including other companies you might interact with in or through the Service.

Your use of the Services is also subject to Terms of Service.

Please read this Privacy Policy together with Terms of Service carefully and make sure you understand them.

Before using the Service, you are required to agree to the processing of personal data described in this Private Policy. If you do not agree to the terms of the Policy, please do not use our Services.

CONTACT US

If you have questions about data protection, or if you have any requests for resolving issues with your personal data, we encourage you to primarily contact us through our Services – our website: www.tensquaregames.com by using the "Support" tab or through User account by using the "Help" tab.

Below you find the identity and the contact details of the controller of your personal data (a relevant controller is an entity which provides you with Services, in most cases that is a provider/developer of a particular game).

For Services provided by Ten Square Games S.A.:

Name of the controller: Ten Square Games S.A.

Address: Długosza 60, 51162 Wrocław, Poland

Registered at: National Court Register - register of entrepreneurs kept by the District Court for Wrocław - Fabryczna in Wrocław, VI Commercial Division of the National Court Register KRS number: 0000704863

tax ID (NIP) No.: 8982196752
REGON statistical No.: 021744780
Share capital of 724.124,50 PLN (fully paid up)

For Services provided by Play Cool Zombie Sport Games sp. z o.o
Name of the controller: Play Cool Zombie Sport Games sp. z o.o
Address: Długosza 60, 51162 Wrocław, Poland
Registered at: National Court Register - register of entrepreneurs kept by the District Court for Wrocław - Fabryczna in Wrocław, VI Commercial Division of the National Court Register KRS number: 0000580667
tax ID (NIP) No.: 8982214450
REGON statistical No.: 362748821
Share capital of 5.000 PLN (fully paid up)

For Services provided by Tiny Dragon Adventure Games sp. z o.o.
Name of the controller: Tiny Dragon Adventure Games sp. z o.o
Address: Długosza 60, 51162 Wrocław, Poland
Registered at: National Court Register - register of entrepreneurs kept by the District Court for Wrocław - Fabryczna in Wrocław, VI Commercial Division of the National Court Register KRS number: 0000634216
tax ID (NIP) No.: 8982223710
REGON statistical No.: 365263544
Share capital of 5.050 PLN (fully paid up)

For Services provided by Fat Lion Games sp. z o.o.
Name of the controller: Fat Lion Games sp. z o.o.
Address: Długosza 60, 51162 Wrocław, Poland
Registered at: National Court Register - register of entrepreneurs kept by the District Court for Wrocław - Fabryczna in Wrocław, VI Commercial Division of the National Court Register KRS number: 0000704592
tax ID (NIP) No.: 8982238999
REGON statistical No.: 368774363
Share capital of 5.000 PLN (fully paid up)

DATA PROTECTION OFFICER

Ten Square Games has appointed a data protection officer (further: "DPO") who is responsible for supervising and implementing a personal data protection strategy and ensures compliance of our operations with the applicable law.
To contact DPO please write at: dpo@tensquaregames.com

THE DATA WE COLLECT

We collect data in three main ways:

DATA YOU PROVIDE US

We collect info you enter or otherwise provide in Services, especially information necessary to create an account (such as username, email address and password).
In our game, you may also create a player profile, which other players can see and which may include the data like:

- player name;
- profile information (such as profile picture, graphics which identifies you).

When you ask for help from our support team, we may collect and store the contact information you provide. We will also store the communications you have with our support and any additional information in those communications in order to provide support and improve the Services. When you contact us for support, we probably ask for information such as:

- ❖ game you are playing;
- ❖ name or nickname;
- ❖ e-mail address;
- ❖ platform you are playing on;
- ❖ problem description;
- ❖ language;
- ❖ player ID or

we might ask for further information if necessary to respond to your query.

If you choose to use communication features in Services that allow you to communicate or share information with us or other players, then we would collect information on what is communicated or shared. This may include your in-game actions like:

- ❖ your messages to the Service (such as chat logs and player support tickets);
- ❖ other data you choose to give us (such as data to identify a lost account);
- ❖ participation in player groups;
- ❖ public posts or comments on other players' profiles;
- ❖ non-public messages or invitations to other players;
- ❖ chats with other players;
- ❖ events in our games.

We also collect data about the ways in which you use and interact with our Services, such as when and for how long you play a game, game features and other players you interact with, purchases you make, progress or levels you achieve, and other gameplay activities.

DATA WE COLLECT AUTOMATICALLY

We automatically collect some info about how you interact with and navigate the Services, as well as the device and software you use. We collect data such as:

- ❖ data about your account (such as account settings) and game progress
- ❖ your IP address and data about your device (such as your device ID, device name and operating system, browser type and language)
- ❖ general location data
- ❖ data about your use of the Service, such as gameplay data (for example purchases you make, progress or levels you achieve, and other gameplay activities) and your interactions with other players inside the Service
- ❖ a player specific-specific ID, which we create for you when you use the Service for the purpose of quick identification

DATA WE COLLECT FROM OUR PARTNERS

If you create an account or log into your account by using a third party platform, when you decide to link a third party tool (such as Facebook, Messenger or Google) with the Service or if you use our Services (especially if you play our games) through any third party applications, we may receive certain data about you from the provider of the third

party application. The information we receive depends on the Services you are using (esp. our game you are playing), the third-party application, your privacy settings, and, if applicable, your friends' privacy settings on that third-party application. We may collect and store some or all of the following information from the provider of the connected third-party application:

- first and last name;
- profile picture your user ID (Facebook ID), which may be linked to publicly-available information (public profile);
- your friends' list and other public data;
- e-mail address you provided to that third-party application;
- physical location and that of the devices you use to access our Services;
- gender;
- age;
- information about your activities on or through the connected third-party application;
- other publicly-available data on the third-party application.

We also collect data related to purchases you make. If you make any payment within a Service, our third-party payment partners will collect the billing and financial information it needs to process your charges. This may include your postal address, e-mail address, and financial data. Our payment partners do not share your financial information, like credit card numbers with us but they may share non-financial data related to your purchases, like your full name, and the items purchased.

When you play our games connected to third-party applications or platforms (like Facebook, Apple or Google), any purchases you make will be processed by that third-party application and subject to that third-party application's terms of service and privacy policy. For these purchases, Ten Square Games does not receive your financial data, but may receive non-financial information related to your purchases, like your full name and the items purchased. The information we receive depends on our game you are playing and the third-party application.

COOKIES AND SIMILAR TECHNOLOGIES

Like most online services, we and our partners use cookies and similar technologies, mobile identifiers included, to provide and personalize the Services, analyse use, target advertisements and prevent fraud. For more information about cookies please check our [Cookie Policy](#).

IS DATA SUBMISSION NECESSARY

Submitting your e-mail address, username and password is necessary for direct registration and creating an account, which allows to use our online Services available through our website and its subdomains. If you register with a third party platform, which mainly relates to our mobile Services, the abovementioned data are not collected by TSG during registration process.

Other data might be necessary for example to make use of some facilities of Services, to serve you advertising more tailored to your interests or to make and process your payments.

We inform you each time if data submission is necessary for providing you with particular Services, making use of facilities within the Services or for any other interaction with Ten Square Games.

LEGAL BASIS OF PROCESSING YOUR DATA

We process your data on the basis 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), which defines the grounds on which the data of yours might be collected and further processed. We process your data also on the basis of relevant national law, in particular the provisions of the Personal Data Protection Act of 10 May 2018 (consolidated text Journal of Laws of 2018, item 1000 as amended) and the Act on the provision of services electronically of 18 July 2002 (Journal of Laws of 2017 item 1219 as amended).

The main reason we use your data is to perform the agreement with you (to provide you with and operate the Services). On that ground (point (b) of Article 6 (1) GDPR) we collect and process only that data which is necessary to render Services or provide you with the facilities of the Services you ask for. We process these data for the period of duration of the agreement.

For safety and security - determining, defending and making claims included - or marketing our own Services, as well as for providing user - friendly Services, we collect and process data on the ground of our legitimate interests (point (f) of Article 6 (1) GDPR). We process the data until the expiry of the limitation period, and in other cases, until the termination of agreement with the User, unless you object to your data being processed for this purpose before that moment.

We process some of your data on the basis of your consent (point (a) of Article 6 (1) GDPR), which might be revoked at any time. This relates primarily to data which are collected for marketing purposes and to provide you with customized advertisement. These data we process until the termination of the agreement, unless you revoke your consent before that moment.

We may process your data to comply with legal obligations (like requests from law enforcement or other public or government authorities, issuing and storing invoices and keeping accounting records, investigating complaints and returns in form and within time defined in relevant legislation) (point (c) of Article 6 (1) GDPR). On that ground we process data for the time necessary to fulfill our legal obligation, which might be strictly defined by relevant legislation (for instance, the duty to keep accounting records for defined time, the statutory period of handling complaints).

The other basis on which we may process data are:

- ❖ protection of your vital interests or those of another person such as to help prevent serious injury or crime (point (d) of Article 6 (1) GDPR)
- ❖ the public interest (point (e) of Article 6 (1) GDPR)
- ❖ third party's legitimate interests (point (f) of Article 6 (1) GDPR)

WHY DO WE COLLECT YOUR DATA

We collect data to help us operate our business, provide and improve our Services,

communicate with Users and advertise effectively. The particular ways we use your data often depend on how you choose to use our Services.

Some of the most common examples of how we use data include:

- ❖ to perform the agreement (we process data necessary to create accounts and allow you to play our games and use other Services);
- ❖ to operate the Services;
- ❖ to make the Service work correctly;
- ❖ to make the Service more suitable for our players;
- ❖ to keep our Services safe and fair;
- ❖ to update player profiles;
- ❖ to develop and improve the Service and player experience;
- ❖ to manage our relationship with you (e.g. to respond to your comments and questions and provide player support, send you related information, such as updates, security alerts, and support messages);
- ❖ to verify and confirm payments;
- ❖ to provide social features as a part of the Service;
- ❖ to provide you Ten Square Games offers in the Service which we believe might interest you;
- ❖ to provide you the opportunity to participate in contests through our Service;
- ❖ to enable you to communicate with other players;
- ❖ to show personalized advertisements.

We may also use, disclose and preserve data to:

- ❖ comply with applicable law or respond to legal process (like requests from law enforcement or other public or government authorities)
- ❖ securely operate the Services (like stopping attacks on our systems)
- ❖ protect players and third parties (such as to help prevent a crime)
- ❖ protect our own rights, property, and operations (like enforcing Terms of Service and pursuing available remedies or limiting damages we may sustain)

PUSH NOTIFICATIONS

We may occasionally send you push notifications through our Services to send you game updates, high scores and other Service related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off at the device level through your settings.

DO WE PROCESS YOUR DATA AUTOMATICALLY (INCLUDING BY MEANS OF PROFILING)

When you use our Services, we collect data about your interactions with the Services and with other players inside the game via server log files.

To show you personalized advertisements, adjusted to your preferences or needs, to keep our Services safe, and to analyze and monitor your use of our Services for the purposes e.g. of our games improvement, we may automatically profile and segment all collected data of yours (the information you provide may be associated with your player ID, IP address or device ID). We may also make marketing decisions to present you with our personalized offers and individual benefits. We prepare them by automatically analysing your data and behaviour, and on that basis we make

automatized decisions, e.g. on a content of an offer and/or whether to make you a given (special) offer or not. The legal basis for such a type of data processing is the binding agreement for rendering services (performance of the agreement) and our legitimate interests.

If your data processing (profiling) is based on our legitimate interests, you have the right to object, on grounds of your particular situation, at any time to such processing of your data. Then, Ten Square Games has no rights to process (profile) your data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedom of yours or processing is necessary for establishment, execution or defence of our legal claims.

If we use your data to make profiling for the purposes of direct marketing, you have unconditional right to object to such processing at any time. In such an event, the personal data of yours shall no longer be processed for such purposes, regardless our interests, rights and freedom.

WHO CAN SEE YOUR DATA

Your personal information are not disclosed, except as described below. Apart from Ten Square Games, your data can be accessed by others in the following situations:

OTHER PLAYERS AND USERS

Social features (like forums and chats) are a core component of our games. When you use these features, other players and users may, for example, see your profile data, in-game activities and read the messages you have posted. Also what you share becomes public information - this means not only may we collect and use the information you provide, but also, in some cases, it may be collected or used by others without your knowledge.

Please note that such public information (communications, comments) together with other user-generated content (like in-game activities) may be recorded and/or stored on our servers to make use of them to protect the safety of our players; to protect our rights and property in connection with our Services; to conduct research; to operate, improve, personalize, and optimize our Services and our players' experiences, including through the use of analytics; and to manage and deliver (tailored) advertising. Where required by law, we will seek your consent for this.

PARTNERS WORKING FOR TEN SQUARE GAMES

Ten Square Games has partners to perform services for us. These partners process your data only at and according to Ten Square Games instructions to provide the Service, such as marketing agencies and other entities supporting us in our marketing activities, external providers of IT services (including IT systems), entities supporting us in dealing with correspondence, entities providing us with consultation, advice and audit services as well as legal, tax or fiscal support, entities offering postal or delivery services, operators of on-line payment platforms, entities cooperating with us in sales.

OTHER COMPANIES AND PUBLIC AUTHORITIES

In order to prevent or combat fraud or other illegal activity, we may exchange data with

other companies and organizations and provide it to public authorities in response to lawful requests.

We may share your information in connection with any merger, sale of our assets, or financing or acquisition of all or a portion of our business to another company. You will be notified via email and/or within a Service of any change in ownership or users of your personal information.

We may share aggregate and anonymous information about you with advertisers, publishers, business partners, and other third parties.

INTERNATIONAL DATA TRANSFERS

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Policy. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission and the Privacy Shield certification in case of transfers to the USA.

CAN YOU INFLUENCE PROCESSING OF YOUR DATA?

At any time you may request access to your data. You may request the data to be corrected. You may also request to have your data erased, restrict the processing of your data or object to such processing. If we process your data based on your consent, you may withdraw such consent at any time.

Please pay attention however that erasure of all your data may be technically impossible if such data is connected with your accounts in other services, in particular social network services and mobile platform operators.

Also keep in mind that use of the Service requires some of your data to be processed as described herein. If you do not accept processing of any of your data, you should cease using the Service.

If you withdraw your consent to process of certain data, you may not be able to use the full functionality of the Service or participate in some activities. The existence of the right to withdraw consent to processing data does not affect the lawfulness of processing based on consent before its withdrawal.

For deletion requests, we will take reasonable measures to delete your personal data from our records. We will keep certain records (e.g., personal data relating to payments or customer service matters) where we need (and have rights) to, such as for legal or accounting purposes. We will also keep data in order to exercise, defend, or establish our rights.

If you consider your rights to be violated or your data processing rules infringed, you are entitled to file a complaint with relevant supervisory authority. Default authority for such a complaint is Prezes Urzędu Ochrony Danych Osobowych in Poland (address: ul. Stawki 2, 00-193 Warszawa, Poland; <https://uodo.gov.pl/en>), however you may also lodge a complaint with any other personal data protection authority in the European

Union member state.

All requests concerning your data should be sent to: dpo@tensquaregames.com

HOW DO WE PROTECT YOUR DATA

In order to help ensure a secure and safe player experience, we are continuously developing and implementing administrative, technical and physical security measures to protect your data from unauthorized access or against loss, misuse or alteration.

However, please note that no such measures guarantee the full security of data we were provided. No server, communication network or data transmission over the Internet is 100% secure. It is your choice you provide us with your data. If you do, you are accepting that you are doing so with this risk.

DATA RETENTION

We retain your data for as long as it is necessary to fulfill purposes as outlined in this Privacy Policy. In most cases that would be for as long as your account is active or as it is needed to provide you with the Services. In certain special cases, a longer retention period might be required by law, such as for tax reasons, accounting purposes or other legal requirements and obligations.

If you wish to cancel your account or request that we no longer process your information, contact us at dpo@tensquaregames.com.

Note that if you ask us to remove your personal data, we might retain your data if it is necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

AGE LIMITS

Our Service is not intended for children under the age of 18. We do not knowingly collect or solicit personal data about or direct or target interest based advertising to anyone under the age of 18 or knowingly allow such persons to use our Services. If you are under 18, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 18 may provide any personal data. If we learn that we have collected personal data about a child under age 18, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 18, please contact us.

UPDATES

We may periodically update this Privacy Policy by posting a new version on tensquaregames.com. If we make any material changes, we will notify you by posting a notice in the Service prior to the change becoming effective. Your continued use of the Service after the effective date will be subject to the new Privacy Policy, unless we will be required, under relevant law, to obtain your separate consent for further data processing.

