



TEN SQUARE GAMES PRIVACY POLICY

Dear User, we are pleased that you have chosen games of Ten Square Games.

Below we present the privacy policy („**Privacy Policy**”) explaining how we process your personal data, with whom we share these data and how long the data will be stored. You will also learn what rights you have and how you can execute them.

This Privacy Policy applies to electronic services provided by Ten Square Games S.A. with its registered seat in Wrocław 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. (collectively referred to as „**Ten Square Games**” or „**we**”) in the form of mobile games, available online on our websites or on third-party websites such as Facebook, in the form of mobile applications („**Services**”).

Please read the Privacy Policy and the enclosed Terms of Service.

I. **WHO DO YOU SHARE YOUR DATA WITH? MEET THE PERSONAL DATA CONTROLLER**

Below we present the name and contact details of the entity acting as the controller of your personal data (the controller is the entity providing the Services; in most cases it is the provider/developer of a given game).

- ❖ For Services provided by Ten Square Games S.A.:
controller's name: Ten Square Games S.A.
address: Traugutta 45, 50-416 Wrocław, Polska
- ❖ For Services provided by Play Cool Zombie Sport Games sp. z o.o.:
controller's name: Play Cool Zombie Sport Games sp. z o.o.
address: Traugutta 45, 50-416 Wrocław, Polska
- ❖ For Services provided by Tiny Dragon Adventure Games sp. z o.o.:
controller's name: Tiny Dragon Adventure Games sp. z o.o.
address: Traugutta 45, 50-416 Wrocław, Polska
- ❖ For Services provided by Fat Lion Games sp. z o.o.:
controller's name: Fat Lion Games sp. z o.o.
address: Traugutta 45, 50-416 Wrocław, Polska.

II. **CONTACT US PLAYER**

Contact us and we will do our best to give you a satisfactory reply.
You can do this in three ways:

- ❖ through the communication channels available on our main website:
www.tensquaregames.com - „Contact” tab or within our Services through the User's account – „Help” tab
- ❖ by letter sent to the address of one of the companies provided in clause 1 of the Privacy Policy
- ❖ by e-mail: administracja@tensquaregames.com



III. DATA PROTECTION OFFICER

Ten Square Games has appointed the data protection officer. You can contact her/him if you want to delete your personal data, exercise other rights you have under the provisions of the law on the protection of personal data, including GDPR, or ask any question regarding the processing of personal data.

Personal Data Controller
Ten Square Games S.A
Traugutta 45, 50-416 Wrocław, Poland
dpo@tensquaregames.com

IV. FOR WHAT PURPOSE DO WE PROCESS PERSONAL DATA AND ON WHAT LEGAL GROUNDS?

The main purpose for which we process your personal data is the need to perform the contract you have concluded with Ten Square Games by accepting the Terms of Service. We need your personal data, among others, to manage the game user's account; enable you to contact other Players, update the Player's profile and provide other services related to the game. In this case, the legal basis for the processing of your personal data is the necessity to perform the contract (Article 6.1. (b) GDPR).

Your personal data may also be processed for other purposes, such as:

- ❖ execution of legal obligations related, among others, to in-game payments (legal basis: the necessity to comply with a legal obligation, i.e. Article 6.1. (c) GDPR);
- ❖ carrying out and verifying payments (legal basis: the necessity to perform a contract, i.e. Article 6.1. (b) GDPR);
- ❖ Player's service i.e. answering questions, comments, chat support, provision of technical support (legal basis: legitimate interests in solving the Players' problems i.e. Article 6.1. (f) GDPR);
- ❖ conducting marketing activities, including activities based on profiling, i.e. presenting Players with other games of Ten Square Games that may be interesting to them, presenting personalized marketing content (legal basis: legitimate interests in promoting Ten Square Games, i.e. Article 6.1 (f) GDPR);
- ❖ conducting and organizing competitions (legal basis: legitimate interests in promoting Ten Square Games, i.e. Article 6.1 (f) GDPR);
- ❖ improving the quality of provided Services, including ensuring an adequate level of game security – sending updates to Players, sending security alerts and other messages from technical support, stopping attacks on systems (legal basis: legitimate interests consisting in ensuring the cyber security of Players, i.e. Article 6.1. (f) GDPR);
- ❖ development and improvement of Services and Players' experience (legal basis: legitimate interests in adapting the Services to the Players' needs, i.e. Article 6.1. (f) GDPR);
- ❖ determination, investigation and defense against legal claims (legal basis: legitimate interests in providing Ten Square Games with effective legal protection, i.e. Article 6.1. (f) GDPR).

V. HOW LONG DO WE STORE YOUR PERSONAL DATA?

The storage time of your personal data depends on the purpose for which we obtained them. Above all, we store your personal data for as long as it is necessary to provide our Services to you.



We may also store your personal data for the duration of our legitimate interests in the data processing or until the moment specified by law.

The storage time of your personal data may also be extended if it becomes necessary to protect our rights.

The Player may delete her/his game account at any time. In such a case, we shall delete personal data, except for those we have to store due to legal provisions or our legitimate interests in determining, pursuing and defending against claims.

VI. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Players' personal data are not disclosed, except for the situations specified below:

1) PARTNERS CONTRACTED BY TEN SQUARE GAMES

Ten Square Games uses the services of its partners. The partners process the Players' data only at the request and in accordance with the instructions of Ten Square Games to provide the Services. Our partners are marketing agencies and other entities supporting us in our marketing activities, external IT service providers (including the providers of IT systems), entities supporting us in handling correspondence, entities providing us with consulting, advisory and auditing services as well as entities providing us with legal, tax or accounting support, entities providing postal or delivery services, operators of online payment platforms, entities cooperating with us in the field of sales.

2) OTHER ENTITIES

We may share information relating to the Player as a consequence of any merger, sale of our assets, financing or acquisition of our business, in whole or in part, by another company. The Player shall be notified by e-mail and/or within the Service of any changes in the ownership or changes of persons using the Player's personal data.

Social features (such as forums or chats) are key elements of our games. When the Players use these features, other players and users may, for instance, see their profile data, in-game activity data and read the Player's posts. Information shared by the Player also becomes publicly available – this means that not only may we collect and use the information shared by the Player, but also, in some cases, the information may be collected and used by other persons having access to such information without the User's knowledge. It is entirely up to the Player what she/he shares with other Players. Ten Square Games does not share any Player data with other Players.

VII. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA COUNTRIES

Due to the global nature of our Services and, also, in order to provide the Players with the best experience, the Players' personal data may be transferred to various countries, including countries outside the European Economic Area („EEA"). As different countries may have different data protection laws than in the Player's country, we take steps to provide appropriate safeguards to protect the data we were provided with.

Appropriate safeguards include in particular:

- 1) decisions of the European Commission stating the appropriate level of protection of personal data in a given country,
- 2) standard contractual clauses approved by the European Commission.



If necessary, in order to increase the security of personal data, we use additional supplementary measures, such as e.g. encryption, to ensure that the transfer of personal data to a country outside the EEA is secure.

We inform you that at any time you have the option to receive a copy of the security measures we use in the form of an appropriate document. For this purpose, please contact us at: dpo@tensquaregames.com.

VIII. YOUR RIGHTS

The Players have the right to:

- 1) demand access to her/his personal data (Article 15 GDPR);
- 2) demand the rectification of her/his personal data (Article 16 GDPR);
- 3) demand the erasure of her/his personal data (Article 17 GDPR);
- 4) demand the restriction of her/his personal data processing (Article 18 GDPR);
- 5) demand the transfer of her/his personal data (Article 19 GDPR);
- 6) object to the processing of her/his personal data (Article 20 GDPR).

If we process your personal data based on your consent, you have the right to withdraw your consent at any time, which, however, shall not affect the lawfulness of processing based on your consent before its withdrawal. In the event of withdrawal of your consent to the processing of certain data, the User may not be able to use the full functionality of some services or participate in certain activities.

It may happen that deleting all the Player's data may be technically impossible if these data are linked to the Player's accounts on other websites, in particular on social networking sites and mobile platform operators.

The execution of certain rights may be limited by the provisions of law or the controller's legitimate interests.

If you consider that your rights or the rules for the processing of personal data have been violated, you have the right to lodge a complaint with the competent supervisory authority. The default authority for such a complaint is the President of the Personal Data Protection Office (address: Stawki 2, 00-193 Warsaw, Poland; <https://uodo.gov.pl/en>), but such a complaint may also be submitted to any other personal data protection authority in one of the Member States of the European Union.

All the Player's requests regarding personal data should be addressed to: dpo@tensquaregames.com.

IX. OBLIGATION TO PROVIDE PERSONAL DATA

Providing us with personal data is a condition for concluding a contract for Services. Obviously, you may decide not to provide us with any data, but then you will have no possibility to use your games. Providing us with other personal data may be necessary, e.g. to carry out the payment process in the game – failure to provide them will prevent the purchase.

X. COLLECTING DATA ABOUT USERS THROUGH INDIRECT MEANS

If the Player creates or logs in to her/his account using a third-party platform and when she/he chooses to link a third-party tool (e.g. Facebook, Messenger or Google), or when she/he uses the Services (in particular, by playing our games) through any third-party



applications, we may come into possession of some of the User's data that will be provided to us by the provider of the aforementioned third-party applications. The information we obtain depends on the Services used by the User (this applies, in particular, to our game played by the Player), the third-party applications used by the User, the User's privacy settings and, if applicable, the privacy settings of the User's friends in third-party applications. We may collect and store some or all of the following information from the provider of the third-party application:

- a) name and surname;
- b) profile picture, Player ID (Facebook ID), which may be associated with publicly available user information (profile picture);
- c) the Player's friends list and other publicly available data;
- d) e-mail address provided in the respective application belonging to a third party;
- e) the Player's location and the location of the devices on which the User uses our Services;
- f) gender;
- g) age;
- h) information regarding other activities undertaken through or in third-party applications;
- i) other publicly available data made available in applications belonging to third parties.

We also collect the data regarding the Player's purchases. If the Player makes any payments, our payment partners collect the billing and payment information necessary to process the Player's fees. These data may include the Player's mailing address, her/his e-mail address and financial data. Our payment partners do not share the Player's financial information with us, such as credit card numbers, but they may share with us non-financial data relating to the Player's purchases, such as name, surname and purchased items.

If the Player plays our games connected with third-party apps or their platforms (such as Facebook, Apple or Google), all purchases made by the Player will be processed by the respective third-party application and will be subject to the terms of service and privacy policy of the respective third party. Ten Square Games does not come into possession of the Player's financial data related to the above-mentioned purchases, but may obtain access to the Player's non-financial information related to the purchases made by her/him, such as the Player's name and surname and the items purchased by her/him. The type of information we receive depends on the game the Player plays and the third-party application.

XI. PROFILING

When the Player uses our Services, we collect data about her/his interactions with the Website and other players in the game through server logs. In order to display personalized advertisements, tailored to the User's preferences or needs, ensure the security of our Services and analyze and monitor the use of our Services by the User for such purposes as, for example, improving our games, we may automatically profile and segment all data collected about the User (the information provided by the User may be linked to her/his gamer ID, IP address or device ID). We may also undertake marketing activities related to addressing our personalized offers and benefits to the User. We prepare them by analyzing the User's data and behavior and, based on them, we undertake activities, e.g. regarding the offer's content and/or whether to submit a given (special) offer to the User or not. The legal basis for such processing of personal data is the contract for services (execution of the contract) and our legitimate interests.

If the data processing (profiling) is based on our legitimate interests, the User has the right to object to such data processing at any time due to her/his particular situation. In such a case, Ten Square Games is not entitled to process (profile) the User's data, unless it



demonstrates compelling and justified grounds for their processing that override the User's interests, rights and freedoms, or when the processing is necessary to establish, perform or defend against legal claims.

If we use the User's data to profile them for direct marketing purposes, the User has the unconditional right to object to such processing at any time. In such a case, the User's personal data will no longer be processed for such purposes, regardless of our interests, rights and freedoms.

XII. PUSH NOTIFICATIONS IN OUR GAMES

We may send push notifications to Players through our games in order to inform them about game updates and new records, as well as to send other notifications related to the Services that may be significant to the Players. The Player may at any time resign from receiving such notifications by disabling them on her/his device using the settings.

XIII. USER DATA SECURITY

In order to help to ensure safe gaming entertainment, we continuously develop and implement administrative, technical and physical security measures to protect the Player's data from unauthorized access, loss, misuse and alteration.

However, it should be noted that none of these measures guarantee full security of the data provided to us. No server, communications network or data transmission technology over the Internet is 100% secure. Providing us with the data is the User's decision. In the event such a decision is made, the Player takes the risk of sharing data.

XIV. AGE RESTRICTIONS

Our Services are not intended for persons under the age of 18. We neither knowingly collect nor strive for personal data of persons under the age of 18. We also don't knowingly target advertising and present target-based ads or knowingly allow persons under the age of 18 to use our Services. If the User is under the age of 18, we ask not to send us any personal data, including name and surname, address, phone number or e-mail address. No person under the age of 18 may provide us with any personal data. If we become aware that we have collected any personal data of a person under the age of 18, we will delete these data as soon as possible. In case of suspicion that we may possess any data provided to us by or relating to a child under the age of 18, please contact us.

XV. INTERNET STORAGE TECHNOLOGIES/ MOBILE IDENTIFIERS

We use Internet storage technologies in our games, including mobile identifiers, in order to:

- enable the use of games and their functionalities,
- ensure their safety,
- improve the quality of games,
- conduct analytical activities enabling us to improve our games,
- conduct marketing activities,
- send PUSH notifications to the Players,
- provide the Players with the possibility to communicate with each other,
- carrying out the transactions.

Using online storage technologies is a common practice of mobile game providers. You don't need to worry about your device's security – technologies used by us have no negative impact



on devices. Also, we don't use technologies the aim of which is to obtain from you more data than those necessary to provide our services.

You can write to us at any time to learn more about the technologies we use in our games.

XVI. UPDATES

We may update this Privacy Policy by posting its new versions on the website and in the relevant games. If we make any material modifications, we shall inform the Player about this fact by notification in the Service before the modification comes into force. Further use of the Service after the modifications become effective will be subject to the updated Privacy Policy.

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