



## TEN SQUARE GAMES PRIVACY POLICY

Dear User, thank you for choosing the games of Ten Square Games.

This Privacy Policy ("**Privacy Policy**") explains how we process your personal data, with whom we share it, and how long the data will be stored. You will also learn what rights you have and how you can exercise them.

This Privacy Policy applies to electronic services provided by Ten Square Games S.A. with its registered seat in Wrocław and its subsidiary Play Cool Zombie Sport 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 are the name and contact details of the entity acting as the controller of your personal data (the controller is the entity that provides 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

### II. CONTACT US

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](http://www.tensquaregames.com) ("Contact" tab) or within our Services through your account ("Settings" > "Support" or similar options);
- by letter sent to the address of one of the companies provided in paragraph 1 of the Privacy Policy;
- by email: [administracja@tensquaregames.com](mailto:administracja@tensquaregames.com).

### II. DATA PROTECTION OFFICER

Ten Square Games has appointed a Data Protection Officer. You can contact them 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 the GDPR, or ask any questions regarding the processing of personal data.

Personal Data Controller  
Ten Square Games S.A.  
Traugutta 45, 50-416 Wrocław, Poland  
[dpo@tensquaregames.com](mailto: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 your in-game account; enable you to contact other users, update your user profile, and provide other services that are necessary for you to play our games. 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 as well as handling complaints in connection with purchases made (legal basis: the necessity to perform a contract, i.e., Article 6.1. (b) GDPR);
- providing user support, i.e., answering questions, comments, chat support, provision of technical support (legal basis: legitimate interests in solving the users' problems, i.e., Article 6.1. (f) GDPR);
- conducting marketing activities, including activities based on profiling, i.e., presenting users 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 users, sending security alerts and other messages from technical support, stopping attacks on systems (legal basis: legitimate interests consisting in ensuring the cybersecurity of users, i.e., Article 6.1. (f) GDPR);
- development and improvement of Services and users' experience (legal basis: legitimate interests in adapting the Services to the users' 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 collected them. In particular, 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.

You may delete your game account at any time. In such a case, we shall delete your personal data, except for data that we are required to store by law or to protect our legitimate interests in determining, pursuing, and defending against claims.

#### **VI. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

Your personal data is 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 data of the users of our products 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.

Our Services include third-party features such as social media tools, APIs or SDKs, and in-game advertising. These partners may have access to your personal data. When these entities process personal information, they do so in accordance with their own privacy policies and principles. We encourage you to read these documents to learn more about their practices regarding the processing of personal data:

- Appsflyer – <https://www.appsflyer.com/legal/privacy-policy/>
- Google Firebase – <https://firebase.google.com/support/privacy?hl=pl>
- Meta – [https://developers.facebook.com/terms/dfc\\_platform\\_terms/](https://developers.facebook.com/terms/dfc_platform_terms/)
- Unity – <https://unity.com/legal/privacy-policy>
- OneSignal – [https://onesignal.com/privacy\\_policy](https://onesignal.com/privacy_policy)
- Sentry – <https://sentry.io/privacy/>
- Helpshift – <https://www.helpshift.com/legal/privacy/>

#### 2) OTHER ENTITIES

We may share information relating to the users of our products as a consequence of any merger, sale of our assets, financing, or acquisition of our business, in whole or in part, by another company. You shall be notified by email and/or within the Service of any changes in the ownership or changes of persons using your personal data.

In addition, your information may be shared in connection with your use of community features (such as forums and chats) that are key elements of our games. When you use these features, other users may, for instance, see your profile data, and in-game activity data and read your posts.

Information shared by you also becomes publicly available – this means that not only may we collect and use the information shared by you, but also, in some cases, the information may be collected and used by other persons having access to such information without your knowledge. It is entirely up to you what you share with other users. Ten Square Games does not share your data with other users.

### VII. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA COUNTRIES

Due to the global nature of our Services and in order to provide you with the best experience, your 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 your 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 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. To do so, please contact us at: [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com).

## VIII. YOUR RIGHTS

In connection with the processing of your data by Ten Square Games, you have the right to:

- 1) demand access to your personal data (Article 15 GDPR);
- 2) demand the rectification of your personal data (Article 16 GDPR);
- 3) demand the erasure of your personal data (Article 17 GDPR);
- 4) demand the restriction of your personal data processing (Article 18 GDPR);
- 5) demand the transfer of your personal data (Article 20 GDPR);
- 6) object to the processing of your personal data (Article 21 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, you may not be able to use the full functionality of the Services.

It may happen that deleting all your data may be technically impossible if these data are linked to your account(s) on other websites, in particular on social networking sites and mobile platform operators.

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

If you believe that your rights or the rules for the processing of personal data have been violated by Ten Square Games, you have the right to file 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 requests regarding personal data should be addressed to: [dpo@tensquaregames.com](mailto:dpo@tensquaregames.com).

## IX. OBLIGATION TO PROVIDE PERSONAL DATA

Providing us with your 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 personal data may also 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 you create or log in to your account using a third-party platform and when you choose to link a third-party tool (e.g., Facebook, Messenger, or Google) to our Services, or when you use the Services (in particular, by playing our games) through any third-party applications,



we may come into possession of some of your data that will be provided to us by the provider of the aforementioned third-party applications. The information we obtain depends on the Services you use (this applies, in particular, to the game you play), the third-party applications you use, your privacy settings and, if applicable, the privacy settings of your 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, your user ID (Facebook ID), which may be associated with your publicly available information (profile picture);
- c) your friends' list and other publicly available data;
- d) email address provided in the respective application belonging to a third party;
- e) your location and the location of the devices on which you use 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 your purchases. If you make any payments, our payment partners collect the billing and payment information necessary to process fees. These data may include your mailing address, your email address, and financial data. Our payment partners do not share with us your financial information, such as credit card numbers, but they may share with us non-financial data relating to your purchases, such as your name, surname and purchased items.

If you play our games connected with third-party apps or their platforms (such as Facebook, Apple, or Google), all purchases made by you 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 your financial data related to the above-mentioned purchases, but may obtain access to your non-financial information related to the purchases made by you, such as your name and surname and the items purchased by you. The type of information we receive depends on the game you play and the third-party application.

## **XI. PROFILING**

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

If the data processing (profiling) is based on our legitimate interests, you have the right to object to such data processing at any time due to your particular situation. In such a case, Ten Square Games is not entitled to process (profile) your data, unless it demonstrates compelling and justified grounds for their processing that override your 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 through our games in order to inform users about game updates and new records, as well as to send other notifications related to the Services that may be significant to you. You may at any time resign from receiving such notifications by disabling them on your device using the settings.

## **XIII. DATA SECURITY**

In order to ensure a safe gaming environment, we continuously develop and implement administrative, technical, and physical security measures to protect your data from unauthorized access, loss, misuse, and alteration.

However, it should be noted that none of these measures guarantees the 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 your decision. If you make such a decision, you accept the risk associated with it.

## **XIV. AGE RESTRICTIONS**

Our Services are not intended for persons under the age of 18. We neither knowingly collect nor strive for the 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 you are under the age of 18, we ask you 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 users,
- provide the users 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. Moreover, 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. NEWSLETTER**

By subscribing to our newsletter, you agree to receive marketing content, product and service information, and surveys from us.

We will process your personal data for the purpose of sending you marketing content in the newsletter, based on our legitimate interest (i.e., Article 6(1)(f) GDPR) in connection with your consent to receive the newsletter. Your data will also be processed for analytical and statistical purposes. The legal basis for such processing is our legitimate interest (i.e., Article 6(1)(f) GDPR), which is to conduct analysis and collect statistics in order to tailor targeted content and Services to newsletter recipients. In addition, your data will be processed in order to establish, assert, or defend against our claims, in which case the legal basis for the processing is our legitimate interest (Article 6(1)(f) GDPR) to be able to defend our rights.

The subscription process is based on the principle of two-step verification (double opt-in) and requires you to provide your email address in the subscription form and then confirm your consent to the subscription by clicking on the link in the verification email sent to the address provided in the subscription form.

You may unsubscribe from the newsletter at any time. Each message sent as part of the newsletter contains a link that allows you to cancel your subscription.

Your information will be stored for the duration of the newsletter or until you unsubscribe, whichever comes first.

## **XVII. 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 you 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.

In case of any discrepancy between the Polish text of this policy and any translation, the Polish text shall prevail.

Last update: 04.12.2024