

# GamoVation Game Creator Platform - Privacy Policy / GDPR

*Version: April 2018*

GamoVation B.V. (“GamoVation”, “we”, “us”) respects the privacy of the game creators (“Game owners”, “you”, “User”, “Users”) of the game creator platform (“Platform”) and is committed to protect the Game owners information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Platform.

## 1. Your Consent

BY CREATING AN ACCOUNT, ENTERING INTO, CONNECTING TO, ACCESSING AND/OR USING THE PLATFORM, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION. PLEASE NOTE: IF YOU OR, AS APPLICABLE, YOUR LEGAL GUARDIAN, DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MUST NOT CREATE, ACCESS AND/OR USE THE PLATFORM AND YOU ARE REQUESTED TO STOP USING THE PLATFORM THROUGH YOUR BROWSER AND DO NOT ENTER TO, CONNECT TO, ACCESS OR USE ANY OF OUR SERVICES RELATED TO THE PLATFORM.

## 2. Subject matter of this Privacy Policy

This Privacy Policy applies to the Platform.

Unless stated otherwise, this Privacy Policy is exclusively in place to regulate how GamoVation treats your personal information. If you make use of services provided by third parties, only the Privacy Policy conditions of these third parties shall apply. Please refer to their Privacy Policy.

### 3. Which information may be collected from Affiliates of the Platform?

In this Privacy Policy "information" means any personal information about you which could identify you (by itself or in combination with other data) such as your name, address or email address.

We may collect the following data about you:

#### **Data you give us directly**

- if you register with us (such as your date of birth, password and email address);
- financial information you provide us when registering like bank account, bank holder, bank name, address, real name and/or company name, VAT ID, Paypal address which we need to process payouts and create the self-billing invoice;
- information you provide us if you report a problem with our Platform;
- information you provide by completing any purchases, such as buying currency and other items;
- information you provide by participating in any chats, forums or social media functions. We will consider that information as part of the public domain;
- information you provide us if you report a problem with the Game.

#### **Data we may collect when you use our Game (whether or not you register with us)**

- data about your location, device type, operating system and platform;
- mobile device identifiers (such as your unique device ID (persistent/non-persistent, hardware type, medial access control ("MAC") address, international mobile equipment identity ("IMEI"), OS, and your device name;
- data about your computer's browser version, operating system version, page loading time, network, generated device identifier information, hashed MAC address, referral source and IP address.
- data generated through playing games such as your high score and rankings; game play history;
- the number of times you visit our Game and the amount of time you spend using the Game;

- when you are accessing the Game through a third-party account such as Facebook or Google - certain information relating to your account with those third parties including your name, user ID, gender, location (country and/or city specific), email address, date of birth, information from your public profile including friends and connections, log in details, avatar, gender and other information based on your use of our Game. You can manage the information which is shared by such third parties by amending your preferences through the privacy settings such third parties provide.

With this list, we try to be as clear and complete as possible, but we find it important to keep this Privacy Policy legible, so there may be other information we collect.

## 4. How do we use your information?

We may use your data in the following ways:

- To provide you the Platform and associated websites and continuously improve their features;
- To store your statistics history like amount of new leads and revenues;
- To provide helpdesk and support services;
- To customise the Platform which is available to you;
- To ensure that you are in compliance with our terms;
- To enable payouts to your bank or paypal account;
- To generate self-billing invoices;
- To improve the Platform;
- To improve the Game;
- To personalise your experience;
- To prevent fraud and crime;
- To meet legal and tax obligations;
- Emails (regarding updates, newsletter, new design, new features, (new) games etc.);
- Administrative purposes, such as notification of a violation of our terms of use.

## 5. Third parties

We use a range of third parties to help us manage your information and the Platform, such as our cloud service provider, Customer Service provider, developers, marketing companies, email providers, email sending providers, payment providers and IT maintenance provider.

These are companies who process data on our behalf and cannot use it for their own independent purposes.

### **PSP / BANKS / PAYPAL**

GamoVation may also use third party payment service providers (“PSP”), who provide payment transaction services to GamoVation. You explicitly consent that GamoVation may provide personal information collected from you to a PSP for the purpose of offering the payment transaction service and that the PSP may use such data for (statistical) analysis of payment transactions. GamoVation shall be allowed to notify a PSP regarding an Affiliate who engages in (or who a party believes has engaged in) any activity that is illegal, that violates any person’s rights, or that resulted in such Affiliate’s suspension or termination of use of the Platform.

### **Developers**

The Platform will continuously be monitored and improved to maintain and effectuate the best experience for our Affiliates. Developers may therefore see and have access to your information, but they will only use this information for optimization and development purposes.

### **Social networks**

The Platform can be accessed and synchronised on multiple devices by using your Facebook account to log in. Facebook may provide certain information about you, including your name, user ID, gender, location (country and/or city specific), email address, date of birth, information from your public profile including friends and connections, login details, avatar, gender and other information based on your use of our Services. We may use this information in order to show you advertisements. Facebook is a third party, so your activities on this social media platform is subject to their user and privacy policies, not ours.

### **Analytics**

We also use web analytics tools, such as Google Analytics, to analyse your use of the Platform. Please see the chapter “Cookies and other technologies” for further information.

### **Other**

We may supply information to other parties if we are required to do so by law or by a ruling from a court of law.

## 6. Storage location of your information & retention

The data that we collect from you may be transferred to, and stored at, a destination outside of the Netherlands or the European Economic Area ("EEA"). It may also be processed by one of our third-party partners operating outside of the Netherlands or EEA. This transfer is required to host the Platform, provide you with support and payment services, perform backups of your data, allow you to use the Platform and the Website and to process your payment details.

We will always ensure that any such transfers are conducted in accordance with relevant laws in order to ensure adequate protection.

We will keep data only for as long as it is relevant and useful for the purpose for which it was originally collected and otherwise where required by law. If you decide to delete an account you have with us, certain data does stay on our GamoVation system for administrative purposes and to defend or bring any legal action.

## 7. Access to information

You have the right to request access to the information we have on you. You can do this by contacting us at [info@gamovation.com](mailto:info@gamovation.com). We will make sure to provide you with a copy of the data we process about you. In order to comply with your request, we may ask you to verify your identity.

We will fulfill your request by sending your copy electronically. For any subsequent access request, we may charge you with an administrative fee.

## 8. Information correction & deletion

If you believe that the information we have about you is incorrect, you are welcome to contact us so we can update it and keep your data accurate.

If at any point you wish for GamoVation to delete information about you, you can simply contact us at [info@gamovation.com](mailto:info@gamovation.com).

## 9. Information security and accuracy

We intend to protect your personal information and to maintain its accuracy. GamoVation implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information such as passwords. We also require that our partners protect such information from unauthorized access, use and disclosure.

Whilst we will do our best to protect your data, the transmission of information by you to us is not completely secure and we cannot guarantee the security of your data. Any transmission is at your own risk. Once we have received your data, we will use the procedures and security features outlined in this section to try to prevent any unauthorised access.

## 10. Cookies and other technologies

We and our third parties might collect information from your visits to our Platform to help us gather statistics about usage and effectiveness, personalize your experience, and tailor our interactions with you. We do so through the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and one called "cookies". A cookie is a piece of data that a Web site can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure Web site usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience to a Web site by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.

We use the services of other companies to optimize our websites and our Platform.

### **Google Analytics**

This website and Platform uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, text files stored on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website and Game (including your IP address) will be transmitted to

and stored by Google on servers in the United States. We use Google Analytics with the add-on “\_anonymizeIP()” so that the IP addresses later transmitted to Google are shortened and modified in advance on the European servers to prevent any direct references to particular persons. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage to the website operator. Your IP address, which has been transmitted by Google Analytics, will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use all functions of this website and Platform. Furthermore, you can prohibit Google from collecting and analyzing the cookie generated data about your use of the website and Platform (including your IP address) by downloading and installing the browser plugin available here <http://tools.google.com/dlpage/gaoptout?hl=en>.

### **Google Remarketing**

Our website and Platform use Google’s remarketing technology. This technology enables users who have already visited our online website and Platform and shown interest in our services to see targeted advertising on the websites of the Google partner network. Likewise users that are similar to the visitors of our website and Platform can be addressed. The advertising will be displayed using cookies. These are small text files saved on the user’s computer. The information generated by the cookie about the website and Platform use will be transmitted to and stored on servers in the United States by Google. Using cookies, the user behavior on a website and Platform can be analyzed and subsequently utilized to provide targeted product recommendations and advertising based on the user’s interests. If you would prefer to not receive any targeted advertising, you can deactivate the use of cookies for these purposes through Google by visiting the website:

<https://www.google.com/settings/ads/>. Alternatively, users can deactivate the use of cookies by third party providers by visiting the Network Advertising Initiative’s deactivation website (<http://www.networkadvertising.org/choices>).

Please note that Google has its own data protection policy which is independent of our own. We assume no responsibility or liability for their policies and procedures. Please read Google’s privacy policy before using our websites (<https://www.google.com/intl/en/policies/privacy/>).

## **Facebook Conversion Tracking Pixel**

With your permission, our website and Platform utilizes the Conversion Tracking Pixel service of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook"). This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Facebook advertisement. We are thus able to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected data remain anonymous. This means that we cannot see the personal data of any individual user. However, the collected data are saved and processed by Facebook. We are informing you on this matter according to our information at this time. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found under: <https://www.facebook.com/about/privacy/>. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside Facebook. In addition, a cookie will be saved onto your computer for these purposes. Only users over 13 years of age may give their permission. If you are younger than this age, please consult your legal guardians.

Please click here if you would like to revoke your permission:

<https://www.facebook.com/ads/preferences/>.

## **Facebook login/connect**

We also offer you an easier way to register for our Platform and services. You can use your existing Facebook account for this purpose. By clicking the Login with Facebook link, you can use this registration method via our online portal. To do this, you need to already have a Facebook account or have access to Facebook.

If you would like to register for the Platform via your Facebook account, the first step of the registration process will immediately redirect you to Facebook. Facebook will then ask you to log in or register. At no time will we have access to your personal login information (username and password).

In a second step, you will connect your Facebook profile with the Platform that you would like to register for. At this point, you will learn what data from your Facebook profile will be transmitted to us. This information is usually your "public information" on Facebook and information that you have made available to the public or authorized for the application in question. Information of this type generally includes your name, profile picture and cover



photo, your networks, your username (Facebook URL), and your user ID number (Facebook ID). We will also use the email address you have saved with Facebook in order to contact you outside of Facebook. You can see an overview of the public information in your profile via the General Account Settings menu of your Facebook profile (<https://www.facebook.com/settings?tab=applications>).

If you would like to remove our Platform's connection to Facebook via Facebook Connect, please log in to Facebook and make the required changes to your profile. We will then no longer have the right to use information from your Facebook profile for you.

### **Twitter Conversion Tracking**

We use the Conversion Tracking service of Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA ("Twitter"). This tracking records if a User of the Platform clicks on a link posted by Twitter. In this way, both we and Twitter can see if a registration has taken place. The identity of the User remains anonymous. In addition, we use Twitter's Tailored Audiences service. This enables us to appeal to our Platform's Users with targeted advertisements. To do this, Twitter uses a code snippet (tag) which we have integrated into our website. No personal data are collected during this process. Tailored Audiences is also used to create lookalike targeting lists.

You can find more information about Twitter's privacy policy in their data privacy statement (<https://twitter.com/privacy?lang=en>). You can adjust your privacy settings for tailored advertisements at this link:

<https://help.twitter.com/safety-and-security/privacy-controls-for-tailored-ads>. Twitter also supports "Do Not Track" (DNT). If you have activated this option in your browser, Twitter will not receive any browser-related information (browser cookie ID) from web partners in order to tailor their advertisements to you.

## **11. What can I do if I have a complaint?**

If you are not satisfied with the way your query or complaint is handled by GamoVation, please let us know by emailing us at [info@gamovation.com](mailto:info@gamovation.com). If you are still unhappy, you may refer your complaint to your local data protection regulator. For example, in the Netherlands this is the Autoriteit Persoonsgegevens (<https://autoriteitpersoonsgegevens.nl>).

## 12. Questions and contact information

If you have a question about this Privacy Statement or GamoVation's handling of your information, you can send an email to us at [info@gamovation.com](mailto:info@gamovation.com). You can also contact us at:

GamoVation B.V.

Dokter van deenweg 162

8025 BM Zwolle

the Netherlands

Trade register number: 51193612

VAT ID: NL823142292B01

## 13. Governing law

This Privacy Policy shall be governed by the laws of the Netherlands and submitted to the exclusive jurisdiction of the courts in the Netherlands.