

This Privacy Protection Policy lays down the method of processing and protection of personal data provided by users in relation to using the websites made available at the actiongameslab.com domain or other domains, as well as the software to be used on mobile devices, administered by ACTION GAMES LAB S.A., which refer to this Privacy Protection Policy (hereinafter: "Website").

"Service" shall be understood as services provided as a part of the Website, including using an internet account made available at the Website, as well as competitions and other similar campaigns for Website users (hereinafter: "Users" and, individually: "User"). ACTION GAMES LAB S.A. stipulates that separate rules on the processing of personal data can be applied with respect to using other Services, as specified in the rules of these Services.

## **§1 Controller**

1. ACTION GAMES LAB S.A., with its registered office in Warsaw, at ul. Jana Kazimierza 46/54, 01-248 Warszawa, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under KRS number 0000531168, with the share capital of PLN 500,000.00, Tax ID No (NIP): 1231267235, Statistical ID No (REGON): 145948614, is the controller of Users' personal data, collected in relation to the Users being interested in using the Services (hereinafter: "Personal Data").

## **§2 Why we collect the data?**

1. Permissions and data that we collect are required do allow proper functionality of the applications and Services.
2. Controller may share the data or allow third parties to collect their own data within our app. Third parties include but are not limited to advertising, analytics, payment and service providing companies.
3. When You use our Services, Controller may collect both Personal and Non-Personal Information.

## **§3 Conditions for acquiring Users' Non- Personal Data**

1. Non-personal data – information that does not directly identify the user.
2. Non-personal data is used in an aggregated form to and provides information on behavior of the userbase as a whole.

## **§4 Conditions for acquiring Users' Personal Data**

1. Personal Data – information that allows to identify a user as certain individual.
2. In order to view the content of the Website, the User is not required to disclose his or her Personal Data.
3. Using the Services and their provision to the User may require the User to disclose his or her Personal Data. Disclosing personal data by the User is voluntary and depends on the User's decision. However, if the User does not provide his or her Personal Data, the Website can refuse to provide the Services or limit access thereto.

4. The User may also be required to make available his or her Personal Data in other justified instances arising from legal regulations, in particular such as authorized state bodies requesting the Controller to provide certain information. In such case, the Controller shall notify the User thereof in every instance, unless legal regulations provide otherwise.

## **§5 Scope of Personal Data and their processing**

1. In justified instances, the Controller is authorized to request the User to provide the following Personal Data: first name and surname, address, telephone number, e-mail. The Controller reserves the right to identify, in the rules of the particular Service, other Personal Data that the User has to disclose in order to use the Service.
2. Personal Data shall be processed by the Controller for the purposes of providing the Services, for internal purposes of the Controller related to keeping the register of the Services provided, for tax purposes or in order to draw up documents for the purposes of further development of the Controller. Shall the User express his or her consent thereto, his or her data may also be used by the Controller or companies making up the ACTION S.A. Capital Group for sending commercial information on their product range, promotions and competitions.

## **§6 Basis for the processing of Data**

1. Personal Data shall be processed upon consent granted by the User and in all instances set by legal regulations, which authorize the Controller to process personal data.
2. Consent granted by the User for the processing of his or her Personal Data shall be expressed by ticking the relevant box in the form during the registration procedure or another procedure allowing to use the Services. The User shall be entitled to cancel his or her consent expressed previously.

## **§7 Commercial information, questionnaires**

1. Based on consents granted by Users, the Controller may send, to e-mail addresses identified by the Users, commercial information on products and services offered by the Controller and companies making up the ACTION S.A. Capital Group, and shall be entitled to send the information on products and services of its partners, inter alia in the form of internet transmissions (webcasts), provided that the Users have agreed thereto. The User may at any time withdraw his or her consent.
2. The Controller shall be entitled to send to the Users, also to e-mails identified by them, questionnaires provided that the Users have agreed thereto. The User shall be entitled to withdraw his or her consent at any time.
3. Controller may use Personal Data, Non-personal data and combination of them to operate the Service, maintain and improve it, provide fairness of the gameplay, protect the Users and prevent any activities that are illegal of break Terms of Service. Data can be also used to provide advertising and for research purposes.

## **§8 Data related to the content of the Website**

1. The Controller shall be entitled to collect the information related to viewing the Website content by the Users, i.e. the number of visits and the point of entry to the particular Website, visit time, scope of the content viewed, number and type of sub-sites opened by the User, references used, IP number of the User's device, etc. Such information shall not be linked by the Controller to Personal Data of the User and shall not be used to identify the User, unless its use is necessary for the Controller to correctly provide the Services. The data referred to in this point shall be used by the Controller only within the scope necessary for the purposes of carrying out market research and analysis of the generated internet traffic within the Website, to obtain statistical data that can be used to assess the level of interest in the content published on the Website.
2. The Controller shall be entitled to store cookies on terminal equipment of the Customer, in order to:
  - a) adjust the content of the Website and the scope of Services to the Customer's preferences and to optimize the use of the Services; in particular, these files allow identifying the User's equipment or another application, and displaying the content adjusted to individual needs of the User;
  - b) create statistics for better understanding the use of the Website by the Users, which allows improving the structure and content;
  - c) maintain the User's sessions;
  - d) present to the Users the advertising content better tailored to their interests;
  - e) record and analyze statistics (inter alia Google Analytics and Google AdWords).
    1. The User may, at any time, erase cookies stored on his or her terminal equipment using options available in the internet browser.
    2. For the purposes referred to in section 1, provided that the User has expressed his or her consent thereto, the Controller shall be entitled to link the Personal Data disclosed by the User in relation to using the particular Service with other Personal Data of this User already processed by the Controller.
    3. In their initial (default) settings, available internet browsers allow storing cookies on the User's equipment. However, every User can reject the installation of cookies on his or her equipment. As a rule, in order to change such settings, it is necessary to use available browser options and deactivate the mechanism for cookies installation. Detailed information about the options and methods of using cookies is available in settings of the internet browser used or on their providers' websites.
    4. Deleting or blocking installation of cookies on the terminal equipment of the User can result in difficulties in using important functionalities of the Website and the Services.

## **§9 Provision and disclosure of Personal Data**

1. Using some Services may require transferring or providing the User's Personal Data to other users of the Website, and in justified instances, providing or transferring Personal Data outside the Website. If this results in transferring Personal Data to another controller, the

processing of Personal Data shall not be subject to the Controller's privacy policy, but to the provisions on privacy protection policy set by such controller.

2. The Controller shall be authorized to provide or disclose Personal Data to third parties in the following instances:
  - a) when the User expresses his or her consent thereto; or
  - b) when it is required by legal regulations; or
  - c) when it is necessary for the purposes of the correct provision of Services.
3. In the aforementioned instances, Personal Data can also be transferred outside the European Economic Area, including to the United States of North America.

## **§10 Rights of the User**

1. The User shall be authorized to access Personal Data, as well as to update and correct them.
2. In the case of circumstances resulting in changing the Personal Data, the User shall be obliged to ensure updating Personal Data at his or her profile on the Website.
3. The Controller shall enable the User to erase his or her Personal Data from the Data File, at the User's request and also in other instances, pursuant to the applicable law.
4. The Controller shall be entitled to refuse erasing Personal Data if the User did not fulfil all his or her obligations towards the Controller or breached the provisions of rules of the Website, any Service or by his or her behavior violated applicable legal regulations, while keeping the Personal Data is justified and necessary to reliably explain the circumstances, as well as to confirm or exclude the User's liability.

## **§11 Contact**

1. The Website User shall be entitled to contact the Controller at any time, in order to obtain the information on the manner of use or intended use of Personal Data by the Controller.
2. The User shall be entitled to request the Controller to erase his or her Personal Data in whole or in a part.
3. The User may contact the Controller by sending a message to the following e-mail address: support@actiongameslab.com.