

**BATTLERITE**  
**PRIVACY POLICY**  
**LAST UPDATED: 28-06-2021**

**Welcome to Battlerite!**

Thank you for using our products and services. We respect your privacy and appreciate your trust and confidence in us.

As required by applicable data protection laws, this privacy policy explains the when, how and why when it comes to processing personal data of you as a PC game Battlerite (“**Game**”) player, the website for the game, customer support and communication related to the Game (“**Game Services**”), and sets out your choices and rights in relation to that information. Please read it carefully - it is important that you understand how we collect and otherwise process your personal data.

Here is a summary of the information contained in this privacy policy. This summary is to help you understand the privacy policy and it is not a substitute for reading the whole document.

**What information do we need to provide the Game Services?**

If you register an account to use the Game then we will need some information from you to set up your user profile. If you need to get in touch with us, then we will also retain some information so that we can get back in touch with you and provide you with assistance.

**How and why do we use your personal data?**

Stunlock Studios uses your information to provide Game and Game Services functions. We also use your information to verify your player account, for security purposes and to support and improve Game Services.

**Who do we share your information with?**

We only share your information with third parties when necessary in order to provide the Game Services, or if we are instructed to by a court, authority or compelled by law. We use third party services to help us deliver the best possible Game experience. We only use third party services to process or store your information for the purposes described in this privacy policy. Lastly, we may be required by a court or certain legal obligations to disclose certain personal information in some circumstances.

**Where do we process your information?**

We keep servers in Sweden, France and Germany. Our customer support representatives, engineers and other teams are located in our offices in Sweden.

**How long do we keep your information?**

We generally retain your information for the whole period during which you maintain a player account for the Game. If you delete your player account, all your personal data will be deleted as well, unless otherwise required by applicable laws. Game-generated data such as game progress or champion level, for example, will be anonymized, with the exception of Usernames, which will be deleted.

**How can you exercise your rights relating to your personal data?**

You may have certain rights with respect to your personal data depending on your country of residence. You may have the right to access, to receive a copy of your personal data, or to delete your data at any time, or restrict or object to our processing of your data.

## How can you get in touch with us?

If you have any questions about this privacy policy, or the way we handle personal data, or want to exercise any rights you may have, please contact us by sending us an email to:

[dataprotection@stunlockstudios.com](mailto:dataprotection@stunlockstudios.com).

Stunlock Studios AB, a Swedish corporation, with registered and business offices at Kaplansgatan 16 G, 541 34 Skövde, Sweden (“**Stunlock**”) respects your privacy and provides you with this Privacy Policy (“**Privacy Policy**”) so that you may understand the ways in which we, acting as a data controller under the GDPR, do and do not use the information you transmit when accessing and playing the Battlerite Game, accessing and using websites, platforms, software services and related services (hereinafter the “**Game**” and “**Game Services**” respectively). Please note that confirmation of having read and understood this Privacy Policy (as well as confirmation of acceptance of our Terms of Use) is required in order to play the Battlerite Game.

### 1. Definitions

“**Applicable Data Protection Legislation**” means any legislation in force from time to time, including the General Data Protection Regulation (“**GDPR**”) 2016/679 of April 27<sup>th</sup>, 2016, such legislation which implements Directive 2002/58/EC and all other applicable laws and regulations that may apply to the processing of Personal Data.

“**Personal Data**” shall mean any information relating to a Data subject; an identifiable person is one who can be defined, directly or indirectly, notably by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Contact data and Service Data are Personal Data.

“**Contact Data**” means any names, phone numbers, e-mail addresses and certain financial details held within commercial systems to conduct the Parties’ relationship management and billing transactions between the Parties;

“**Controller**”, “**Data Subject**”, “**Personal Data**”, “**Process/Processing**” and “**Processor**”, shall have the same meaning as in the GDPR.

“**Service Data**” means any Party’s Personal Data (that is not Contact Data) held within the Parties’ systems, applications or databases and that may be accessed, processed, used or stored as a consequence of performing the services under the applicable agreement.

“**Third Country**” means a country that is: (i) outside of the European Economic Area; and (ii) not the subject of a formal decision by the European Commission, made pursuant to Article 45 (1) of the GDPR, stating that that country ensures an adequate level of protection for personal Data.

### 2. Collection of information

#### Information collected through the Game

In order to access and play the complete Game, you must register an account with Stunlock and the platform/service providers that are providing the Game etc. to you. You must then create an account on the Game’s web page or on the platform/service providers’ platforms that hosts the Game to access such premium game functions, levels, content and features etc. To create an account you are required to provide certain mandatory information such as your name, your email address, account login etc. which is mandatory in order to be able to establish an account.

Stunlock's platform service provider, also handling payments (and any refunds), collects payment information data. Stunlock does not process any personal data in this context other than date and time for completed transaction as communicated by Stunlock's platform service provider in conjunction with confirming that a certain user has provided payment.

Stunlock may also collect and process other information when you interact with the Game online in any way, such as the type of operating system you are using; the IP address or other unique identifier such as a device identifier of any of your computer(s) that are used to access the Game or information generated when you adjust your friends list and silenced players list.

### 3. Cookies and similar technologies

A cookie is a small text file that is downloaded onto your device (e.g. computer or smartphone) when you access a website. It allows the website to recognize the device and store information about your preferences to make your visit more efficient and enjoyable. Stunlock uses cookies and similar technologies that are necessary for the functionality of the website. Please visit our [Cookie Policy](#) for further information.

### 4. Use of information – Purpose, legal basis and retention policy

Stunlock will use information about you for the following purposes in accordance with applicable laws:

Personal Data	How and why we use this data	Legal bases and retention times
<i>Information you provide to us. Retention Policy: Stored for the full lifetime of your use of the Game and Game Services or until your account is deleted in accordance with your request.</i>		
Birthdate	<p>To identify your age for data protection purposes, for example to determine the legal requirements for processing of Personal Data. You may use the game only if you are a "natural person" and legally of age to enter into the relevant agreement according to the laws of your country. Such legal age may be 13 years old, or higher, depending on your country.</p> <p>We do not knowingly collect Personal Data from children under 13 years old in the Game without parental or legal guardian consent.</p> <p>We believe it is important to safeguard the privacy of children and encourage parents and legal guardians to regularly monitor their children's use of online activities. If you are a parent or legal guardian, and believe that your child has provided their personal data to us without your consent, please contact us at <a href="mailto:dataprotection@stunlockstudios.com">dataprotection@stunlockstudios.com</a> and we will work to delete that account and any such Personal Data.</p>	<p>Necessary to perform our contract with the Game player to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.</p>
Email address	<p>To secure your game account. It gives us the ability to contact users regarding any issues with their accounts. Additionally, it gives users a platform-independent method to secure their identity as the owner of that particular game account outside of the current authentication system.</p> <p>If Game players consent to receive newsletters and marketing communication, then we also use their email addresses for such purposes.</p>	<p>Necessary to perform our contract with you to provide the Game. Necessary for Legitimate interests, because we provide users with a game service that includes player support. This is in compliance</p>

		with Articles 6(1)(b) and 6(1)(f) of the GDPR. Based on users' consent, we may also send marketing communication and newsletters.
First and Last name, location and signature of the parent or legal guardian giving consent for a minor to play the Game	Parental or legal guardian consent is mandatory for minors to be allowed to play the Game.	Necessary to perform our contract with the Game player to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
First and last name of the minor whose parent or legal guardian is giving consent to process the minor's personal data needed to play the game.	Parental or legal guardian consent is mandatory for minors to be allowed to play the Game.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
<i>Information generated as part of the Game (including Game Services). Retention Policy: Stored for the full lifetime of your use of the Game and Game Services or until your account is deleted in accordance with your request. Information exclusively related to customer support will be stored until the support enquiry has been resolved.</i>		
Region Location (You select this manually when choosing a server region to play the game) and IP.	To set up your gameplay on a regional server, provide you with a geographic ranking of your location and to improve your connection and gameplay experience.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
In-game username and unique Player ID	To give you an identity in the Game.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
Friends list and silenced users	If you choose to add a user as a friend or silence a user, we will store that information to allow/prevent communication between you and the relevant user.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of

		the GDPR.
Gameplay statistics (account and champion levels, match scores), game progress, player activity, inventory, date and time stamps of actions	Necessary for the operation of the game, to store your game progress, give you access to your cosmetic items, records and information about your gameplay and progress.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
Log Data (In-game or/and DLC purchases made outside of the Game and match results (win or lose), in-game performance).	To keep a record of log-in, actions and matches played with your account. To improve Game functionality. To provide you with technical assistance on your request. To secure and verify your account.	Necessary to perform our contract with you to provide the Game. This is in compliance with Article 6(1)(b) of the GDPR.
Email address, Customer Support Zendesk Ticket ID & Communication with Support: Name and email address (if you choose to disclose your name and email), Discord username, computer specs and details of ticket and error.	To provide you with customer and technical support to solve enquiries, provide troubleshooting, fixing bugs and assist with any Game-related issues you might experience. We use Discord for general communication with our players.	Necessary to perform our contract with you to provide the Game and support. This is in compliance with Articles 6(1)(b) and 6(1)(f) of the GDPR.  Retention time for support matters: until the support inquiry has been handled.

**General Statement regarding information you provide or is collected from you in or in relation to the Game and information from other sources**

Information is provided by you or collected in or in relation to the Game and/or collected from other sources in order to:

- provide, operate, improve and maintain the Game, game experience and services, your account(s);
- send technical notices, updates, security alerts,
- provide support and for troubleshooting reasons;
- send support and administrative messages;
- provide news and information about the Game and about our other games and products;
- identify, fix, and troubleshoot bugs and service errors, provide software updates, etc.;
- resolve disputes, investigate and help curb fraud and illegal behavior, comply with the law, and to enforce our agreements and policies;
- communication reasons related to the Game and related matters;
- manage the Game and send you confirmations and important information about your account, products, purchases, subscriptions, and warranties and;
- present offers and/or information relating to the Games and other games that you might like and;
- make recommendations to you.

Processing of this information is necessary for

(i) the purpose of performance of a contract to which you are party in order to support the operation of the Game facilitate the delivery of requested products and services and enable maintenance and update of the Game under Article 6(1)(b) of the GDPR and

(ii) purposes of providing advertisements if you have consented to such email correspondence pursuant to Article 6 (1)(a) or if legitimate interest apply as a legal basis pursuant to Article 6(1)(f) of the GDPR and

(iii) improving our services in accordance with Article 6(1)(f) of the GDPR ("the balancing-of interest rule").

We only process your information to the extent that is necessary to achieve the purposes for which the information has been collected.

## **5. Storage of Personal data**

In addition to the retention periods set out above, Stunlock may further store personal data in order to establish, exercise or defend a legal claim or to comply with applicable law, including accounting rules.

Stunlock will also (i) ensure that their employees and employees of their affiliates and subcontractors involved in the performance of the agreement with you at hand comply with the agreement's provisions; (ii) implement all reasonable technical and organizational measures to protect your Personal Data against any accidental or unlawful destruction, accidental loss, unauthorized alteration, communication or access and (iii) where required, report to you, any unauthorized access, disclosure, use, modification or destruction of your Personal Data.

## **6. Information we share with third parties**

As a general rule we will not share Personal Data that directly identifies you (such as your name or e-mail address) with independent third parties without your consent, unless it is either required by law or we determine that disclosure is reasonably necessary to enforce our rights, property or operations or to protect our players or third parties. We may share anonymous or aggregated information, or other data that does not directly identify you, with third parties, for instance your persona on leaderboards or to show trends about use of our products.

To comply with the contract between Stunlock and you, including to provide you with the Game Services, your Personal Data will be processed on servers that may not be located in your country of residence. Regardless of the location of our servers, we take all the appropriate measures to safeguard your rights in accordance with this Privacy Policy.

Notwithstanding the forgoing, we may share information about you with certain third parties based on the legal bases in Articles 6(1)(b), 6(1)(c) and 6(1)(f) of the GDPR as follows:

### · Third Party Agents and Contractors

We may share information about you with third party agents and contractors in order to provide the Game to you, for ongoing development, for analytical purposes etc. We will only provide information to such third party agents and contractors for their performances of their specific assignments for us and consistent with this Privacy Policy, and for no other purposes and provided that such third party agents and contractors have ensured an adequate level of protection of the Personal Data in accordance with all Applicable Data Protection Legislation and/or through agreements with us.

### · Third parties

When required by applicable law, rule, regulation, legal process, in the process of negotiations of, any mergers and acquisitions, sale of company assets, financing or acquisition of all or a portion of our business by another company where Personal Data submitted to us may be transferred to the acquiring entity.

### · Courts, law enforcement agencies, legal authorities etc.

When ordered or requested by courts, legal authorities etc. and required in order for us to abide

by applicable laws, or to protect our rights, in defense in law suits, property or safety of Stunlock, the Game, end users etc.

## **7. Payment information**

Stunlock does not sell, transfer or share customer information with third parties, except where the information is transferred, disclosed and shared with its third-party agent(s) who uses the information solely to handle and deliver certain services necessary to operate Stunlock' business (e.g. processing orders and payments).

In order to access certain premium game functions, cosmetic items, features, etc. you are required to pay certain fees. When purchasing such features and functions, etc. you may be asked by the platform/service providers handling such payments to provide certain Personal Data, such as full name, billing address, email address and credit card number/expiration date, etc. Please note that you must be of legal age according to the laws of your country to make purchases., Minors may however access and play the Game, subject to parental or legal guardian consent.

Following successfully entering of valid credit card information etc. and completion of the order process, a purchasing account will be created and maintained. The platform/service providers will use the information provided to process the order and to send order confirmations via email, as well as to make future purchases easier for the user and, where applicable, handle refunds.

## **8. Security**

Stunlock Studios is committed to protecting and maintaining your privacy. Stunlock has taken appropriate measures to ensure that the Personal Data it collects is protected by safeguarding confidentiality, security, and integrity of the Personal Data. Personal Data is stored in secure operating environments that are not available to the public and that are only accessible to authorized employees and contractors. We also have security measures in place to protect the loss, misuse, and alteration of the information under our control. However, there is no such thing as perfect security. As a result, although we strive to protect Personal Data, we cannot ensure or warrant the security of any information transmitted to us through or in connection with the Game, that we store on our systems or that is stored on our service providers' systems.

Please note that Stunlock may provide links to other games and websites that are operated and hosted by third parties who may have their own information collection practices. Those other games and websites are governed by their own privacy policies, which may be substantially different from Stunlock' policies. Visitors to other games and websites are encouraged to review the privacy policies and information collection practices of those websites.

Any improper collection or misuse of User Content or information provided in the Game is a violation of the Terms of Use and should be reported to Stunlock at [dataprotection@stunlockstudios.com](mailto:dataprotection@stunlockstudios.com).

## **9. International Data Transfers**

We may transfer and share your information to third parties (including service providers operating on our behalf) which may be located in countries outside the European Union ("EU") and/or the European Economic Area ("EEA") which may not have the same level of data protection laws as those in the country where you are located. Where your data is sent to a country outside the EU/EEA that is not subject to an adequacy decision by the EU Commission, the transfers will only occur based on the following safeguards: i) If the entity is certified to comply with the principles for data protection under the US-EU Privacy Shield Framework ("Privacy Shield") (see Privacy Shield at [www.privacyshield.gov](http://www.privacyshield.gov)) **provided that Privacy Shield is recognized as a valid legal safeguard for such transfer**, or ii) If we have entered into EU Commission approved standard contractual clauses with the entity, which is deemed to offer sufficient safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals.

## **10. Your Choices and Controls**

Under the GDPR, individuals have the following rights regarding Personal Data:

### **The right to request access**

In accordance with Article 15 of the GDPR you may request access to processed Personal Data. This includes confirmation as to whether or not Personal Data concerning him or her are being processed, and, where that is the case, access to the Personal Data and the following information:

- the purposes of the processing;
- the categories of Personal Data concerned;
- the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the Personal Data will be stored or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the Personal Data are not collected from you, any available information as to the source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where Personal Data are transferred to a third country or to an international organization, you have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

You shall be provided a copy of the Personal Data undergoing processing. For any further copies requested, we may charge a reasonable fee based on administrative costs. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others. Please note that the access may be restricted due to intellectual property or trade secrets.

### **The right to object**

You have the right to object to the Personal Data processing on grounds relating to your particular situation when the data are processed based on the balancing-of-interest rule in Article 6(1)(f) of the GDPR, see Article 21 of the GDPR. In this case, we will cease the processing unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defense of legal claims. You have the right to object to our processing of your Personal Data for direct marketing purposes at any time. We will cease the processing of your Personal Data for this purpose after the objection. Please note that if you exercise this right, your user license to use the Game and related services will cease automatically.

### **Right of correction and erasure**

You have the right to have inaccurate Personal Data rectified, in accordance with Article 16 of the GDPR.

You have the right to have your Personal Data erased where one of the following grounds applies, see Article 17 of the GDPR:

- The Personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed,
- if you have withdrawn your consent and there are no other legal grounds for the processing,
- if you have objected to the processing and there are no overriding legitimate grounds for the processing,
- the Personal Data have to be erased for compliance with a legal obligation in Union or Member State law,
- the Personal Data have been unlawfully processed or
- the Personal Data have been collected in relation to the offer of information society services.



Please note that your right to erasure may be limited if the data are necessary for compliance with a legal obligation or for the establishment, exercise or defense of legal claims.

### **The right to restriction**

You have the right to obtain restriction of processing in certain circumstances, in accordance with Article 18 of the GDPR. If you have the right to restriction, we will only process your Personal Data with your consent or for the establishment, exercise or defense of a legal claim or to protect a person or important grounds of public interest.

### **The right to withdraw consent**

If we have asked for your consent to our processing of your Personal Data, you have the right to withdraw your consent at any time, in accordance with Article 7 of the GDPR. If you withdraw your consent, we will cease processing of the Personal Data for which you have withdrawn consent, unless we have a legal obligation to keep some or parts of your data. Please note that if you withdraw your consent, your right to play the Game and related services will cease automatically. The withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

### **The right to data portability**

You have the right to receive your Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance if the processing is based on consent or contract performance, in accordance with Article 20 of the GDPR.

### **Changing or Removing Account Information**

Access and control over most Personal Data in the Game is readily available through the profile editing tools on the webpage or the gaming platforms. End Users may modify or delete any or all of their profile information at any time by logging into their accounts. Information will be updated as soon as possible. End Users who wish to deactivate their Game account may do so in their accounts on the webpage or the gaming platforms. Removed information may persist in backup copies for a reasonable period of time but will not be generally available to other End Users or visitors of the Game. You cannot however remove communications made in any communication features in the Game, which might have been shared with other End Users (for example sending personal messages to other End Users).

If you wish to invoke any of the rights described above, you may contact us at any time by emailing us at [dataprotection@stunlockstudios.com](mailto:dataprotection@stunlockstudios.com). We will process and answer your requests without undue delay and in any event within one month of our receipt of the request unless a longer period is required due to the complexity of the request. In this case, our response time can be up to three months in total as permitted by Article 12 of the GDPR.

## **11. Country specific provisions**

<b>#</b>	<b>Country</b>	<b>Input</b>
1.	Canada	<p>The following applies if you are located in Canada:</p> <p>We use third party service providers which may be located outside of Canada, and as a result, your personal information may be transferred and stored outside of Canada. Such jurisdictions may not have the same level of data protection laws as those in Canada, and your information may be accessed by foreign law enforcement authorities in such jurisdictions in accordance with applicable law.</p> <p>If a user located in Canada wishes to exercise their privacy rights pursuant to applicable Canadian privacy laws, or to obtain further information about our policies and practices with respect to storage and transfer of personal information outside of Canada, they may contact us at <a href="mailto:dataprotection@stunlockstudios.com">dataprotection@stunlockstudios.com</a>. Our privacy experts who</p>

		<p>monitor this email address are also able to answer any questions users may have about the collection, use, disclosure or storage of personal information by our service providers.</p> <p>To the extent that we send certain commercial electronic messages ("CEM") to you, such as our newsletters, we will do so in compliance with Canadian Anti-Spam Legislation ("CASL"). You may withdraw your consent from receiving such CEMs by using the unsubscribe mechanism contained in the CEM, which we will process within 10 business days. Alternatively, if you no longer wish to receive CEMs from us, you may e-mail us at <a href="mailto:dataprotection@stunlockstudios.com">dataprotection@stunlockstudios.com</a> with a request to unsubscribe.</p> <p>We will comply with applicable privacy laws when making changes to our Privacy Policy, and if required by law, we will notify you of any material changes, and confirm your consent prior to the changes coming into effect.</p>
2.	Russian Federation	<p><b>Localization of user data</b></p> <p>The following apply when we collect personal data of Russian citizens:</p> <p>When we collect personal data of users from Russia, we record, systematize, accumulate, store, correct (update, alter), and retrieve such personal data using databases located on the territory of the Russian Federation before uploading to our European servers.</p> <p><b>Legal grounds for data processing</b></p> <p>When we process your personal data, we rely on the following legal grounds:</p> <ul style="list-style-type: none"> <li>(1) Your consent to personal data processing, which you provide when signing up to the Game for the first time;</li> <li>(2) Necessity to perform our contract with you to provide the Game (including when processing cookies);</li> <li>(3) Our legitimate interest in processing your personal data (to the extent allowed by applicable law);</li> <li>(4) Our obligations to process personal data, when we required by law.</li> </ul> <p><b>Children data</b></p> <p>The following apply when the collecting, processing and use of your personal data is conducted within the territory of Russia and/or when we intentionally process personal data of persons located in Russia:</p> <p>We do not knowingly collect Personal Data from children under 14 years old in the Game without parental or legal guardian consent.</p>
3.	Taiwan	<p>Article 17 of the Taiwan Personal Data Protection Act applies where the collecting, processing and use of your personal data is conducted</p>

		<p>within the territory of the Republic of China (Taiwan).</p> <p><i>Consent</i></p> <p>By using the Game Services, you consent (for the purpose of Article 19 of Taiwan Personal Data Protection Act) to the collection, processing and use of your Personal Data in accordance with this Privacy Policy, as amended from time to time.</p> <p><i>Your Rights</i></p> <p>(a) Access: You have the right to make an inquiry of and to review your Personal Data.</p> <p>(b) Copy: You have the right to request a copy of your Personal Data.</p> <p>(c) Supplement and Correction: You have the right to require us to supplement or correct your Personal Data.</p> <p>(d) Objection: You have the right to require us to stop collecting, processing or use of your Personal Data.</p> <p>(e) Erasure: You have the right to require us to erase your Personal Data.</p> <p>If you wish to make the above request, please refer to our contact information under "How can you get in touch with us" of this Privacy Policy.</p> <p><i>Children</i></p> <p>The legal age referred to in this Privacy Policy is 20. If you are under the age of 20, you undertake that you have the consent of your parent or legal guardian to register an account on the Game and use the Game Services.</p>
4.	Turkey	<p>To the extent our processing of your personal data is subject to the <b>Law No. 6698 on Protection of Personal Data of Turkey ("Turkish Data Protection Law")</b>, the following terms apply to you and in the event of any conflict between the following additional terms and the provisions of the rest of the policy, the following terms shall prevail.</p> <p><u>For the purposes of this Privacy Policy, "Third Country" shall be deemed to include Turkey.</u> We may rely on the following legal bases while processing your personal data in accordance with Article 5 of the Turkish Data Protection Law:</p> <ul style="list-style-type: none"> <li>• processing is explicitly laid down or dictated by laws</li> <li>• processing of your personal data is necessary provided that it is directly related to the conclusion or fulfilment of the contract between us</li> <li>• processing is mandatory for us to be able to comply with our legal obligations</li> <li>• processing is mandatory for our legitimate interests, provided that it does not violate your fundamental rights and freedoms</li> <li>• your explicit consent (Please note that we rely on this legal basis only when we require your consent for the processing and we do</li> </ul>

		<p>not rely on this legal basis if and when we rely on one of the other legal grounds above)</p> <p>According to Article 11 of the Turkish Data Protection Law, you have the following rights with respect to your personal data:</p> <ul style="list-style-type: none"> <li>• the right to learn whether we process your personal data</li> <li>• the right to request information with regard to such processing, if we process your personal data</li> <li>• the right to learn the purposes of the processing and whether they are used for such purpose or not</li> <li>• the right to know the third parties within or outside the country, to whom we transfer your personal data</li> <li>• the right to request correction of incomplete or inaccurate personal data</li> <li>• the right to request deletion or destruction of your personal data under the conditions set forth in Article 7 of the Turkish Data Protection Law</li> <li>• the right to request that we notify the third parties, to whom we transferred your personal data, about the correction, deletion and/or destruction of your personal data per your request within the scope of the foregoing two items</li> <li>• the right to object to the negative results about you that are due to the analysis of your personal data processed solely by automated means</li> <li>• the right to claim indemnification for damages incurred due to illegal processing of your personal data</li> </ul>
5.	United Kingdom	<p>In relation to personal data of data subjects in the UK which is subject to the UK GDPR:</p> <ul style="list-style-type: none"> <li>• references to the GDPR in this Privacy Policy shall be interpreted as meaning the GDPR as incorporated into the laws of the United Kingdom (“UK GDPR”);</li> <li>• “Third Country” as defined in the Privacy Policy shall include any country or territory that is outside of the United Kingdom that is not deemed adequate for the purposes of the UK GDPR.</li> </ul> <p>We may transfer and share your personal data to third parties (including service providers operating on our behalf) which may be located in countries outside the United Kingdom (“UK”) which may not have the same level of data protection laws as those in the country where you are located. Where your data is sent to a country outside the UK that is not subject to adequacy regulations under the UK GDPR or otherwise deemed adequate for the purposes of the UK GDPR, the transfers will only occur where we have appropriate safeguards in place under the UK GDPR, for example where we have entered into EU Commission approved standard contractual clauses with the entity (or approved standard contractual clauses under the UK GDPR for the purposes of transfers of personal data outside of the UK), which is deemed to offer sufficient safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals.</p>

6.	Brazil	<p>Users residing in Brazil, under certain circumstances and subject to the restrictions set forth by applicable law, including law # 13709/18 ("LGPD"), You have the following rights in connection with your personal data:</p> <ul style="list-style-type: none"><li>• confirm the existence of processing of your personal data that Stunlock lawfully makes;</li><li>• access your personal data, and request a full simplified or full report about the personal data that Stunlock is lawfully processing about you;</li><li>• request correction of any incomplete, outdated or inaccurate personal data Stunlock holds about you, although Stunlock may need to verify the accuracy of the new data you provide to us;</li><li>• request anonymization, blocking or deletion of unnecessary or excessive data, or data processed in non-compliance with the applicable law;</li><li>• revoke your consent at any time, where Stunlock relies on your consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent;</li><li>• request deletion of your lawfully processed personal data that was processed based on your consent;</li><li>• request information about public and private entities with which Stunlock has shared your personal data;</li><li>• request data portability or the transfer of your personal data, in certain circumstances, pursuant to applicable laws.</li></ul> <p>If you wish to exercise these rights, you may contact Stunlock by e-mail at <a href="mailto:dataprotection@stunlockstudios.com">dataprotection@stunlockstudios.com</a>.</p> <p>You may also contact Stunlock at any time if you have queries, as indicated below, and you also have a right to lodge a complaint with the applicable supervisory authority.</p> <p>If you have a concern about how Stunlock collects and use information, please contact Stunlock Data Protection Officer Ruth Dominguez at <a href="mailto:dataprotection@stunlockstudios.com">dataprotection@stunlockstudios.com</a>.</p> <p><b>International Data Transfers</b></p> <p>You are aware and understand that Stunlock may transfer or disclose personal data that Stunlock collects about you to recipients in countries other than Brazil. These countries may not have the same data protection laws as Brazil. When Stunlock transfers or discloses your personal data to other countries, Stunlock will protect that information as described in this Privacy Policy and</p>
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		<p>Stunlock will take steps to ensure that your personal data is adequately protected as required by applicable data protection laws.</p> <p><b>Children data</b></p> <p>Stunlock does not knowingly collect any personal data from individuals located in Brazil under the age of 12 without parent or legal guardian consent.</p> <p>If you are 12 to 16 years old, we may request that you are represented by a <b>parent/legal guardian</b>. If you are 16 to 18 years old, please make sure that you are assisted by a <b>parent/legal guardian</b>.</p>
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**[California Privacy Rights.** California law in some cases entitle California residents to ask us for a notice describing what categories of personal information Stunlock collects, from what sources, for what purpose and with whom Stunlock shares such information. California law also in some cases provide California residents with rights to request access to and deletion of certain personal information, to know whether personal information is shared, and to opt out of the “sale” of personal information. To understand how we honor these California rights, to make requests regarding these rights if they apply, please visit our [California Privacy Notice and Policy](#).]

**12. Changes to our Privacy Policy**

This Privacy Policy applies to all information collected by us or provided to us on and after the Effective Date. This Privacy Policy is subject to change and we may make any changes to this Privacy Policy as we see fit. Stunlock will notify you of material changes by posting them in the Game, or on the websites, etc. You are encouraged to check back and review this Privacy Policy from time to time so that you will always know what information is collected, how it is used and to whom it is disclosed. Your continued use of our services and playing of the Game subject to this Privacy Policy will signify your acceptance of Privacy Policy changes.

**13. Contact**

If you have any questions, complaints or comments regarding our Privacy Policy, please contact Stunlock at:

Stunlock Studios AB  
 Box 133, 541 23 Skövde  
 Email: [dataprotection@stunlockstudios.com](mailto:dataprotection@stunlockstudios.com)

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