



*I agree to the processing of my personal data*

## **1. INTRODUCTION**

This Privacy Policy describes the measures that we take to preserve and safeguard your privacy when you visit our website located at “[Website](#)” or make use of our games, Website, online shop, forums, social media channels, customer and technical support and any other services we provide to you (“Services”) . It also demonstrates how we may process data in accordance with the EU General Data Protection Regulation ("GDPR"). Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it.

For the purpose of the GDPR, the data controller is Unfrozen Ltd., registered office: *118 Agias Fylaxeos, Christabel House, 3087 Limassol, Cyprus*, registration number *HE421434* (“Unfrozen”, “we” or “us”) is committed to protecting the privacy of all individuals in respect of whom we hold personal data. If you do not agree with our policies and practices, your only recourse is not to use our Website or Services.

“Personal data” is information that identifies you or that can be used to contact you (online or offline). Personal data can include but not limited to your name, email address, physical address, Internet Protocol (IP) address, telephone number, birthdate, etc.

All capitalised terms used but not defined herein shall have the meaning given to them in the Terms of Use.

## **2. GENERAL INFORMATION**

This Privacy Policy governs personal data and non-personal data, which we collect from you when you're using our Website and Services. We maintain reasonable and appropriate security safeguards designed to protect your information from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the information.

## **3. HOW WE USE YOUR DATA**

We rely on the following grounds to legally collect and use your personal data:

- The data are necessary to provide our Services to you;

- We are using your personal information where it is in our legitimate interests to do so;
- We have a legal obligation to process your personal information;
- You have consented to the use of your personal information by us.

We will use your personal information for the following purposes:

- to provide the Services to You;
- to improve the quality of our Website and Services and to offer new features to you;
- to understand, improve, and research products, features, and services;
- to comply with the legal requirements set by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Also, when we have your consent, we may process your personal data:

- to provide you with marketing information (including personalised and targeted marketing emails) regarding goods and services you request from us or which we feel may interest you and
- to target and personalise our marketing communications, offers and advertisements that we display on our Website and websites of third parties. To the extent that our processing of your personal data is subject to the GDPR, we rely on its legitimate interests, described above, to process your data.

## 4. PERSONAL DATA WE COLLECT

We may collect the following data:

**a. When setting up an Account**, you may be asked to provide personal data including, but not limited to, your username, password and email address. You may also use your credentials from other services such as Google, Facebook, Twitter, Apple iCloud to create an account faster with us, in such case we will get information relating to your account on social networking sites in order to allow you to integrate or link your social network account with your Account or our Services;

**b. When you provide feedback about our Services.** These data include information that you post, comment, share content or like in any of our forums, social networks, and on the Website and information sent through the chat functionality;

**c. We collect personal data whenever you contact us and provide us with information that we are able to identify you by.** This includes information such as your name, email address, and phone number, that you give us by filling out forms on this Website, registering or by corresponding with us by phone, email or otherwise;

**d. In order to make a purchase on our Website**, as well as for access to the personalised services, if applicable, we collect your data, which is necessary to fulfil obligations on the part of the Unfrozen. This information may include your username, full name and contact details including your delivery address, email address and phone number;

**e. In order to fix crashes and other technical issues** that may arise while you are using our Services,

as well as to make our Services more suitable for you, we collect, store and use information about the device you are using the Services on, including what type of device it is, what hardware and operating system you are using, the device settings, unique device identifiers, and crash data;

**f. When you access our services using your credentials from a social network or external platform**

we may process your social network IDs, details about your use of social networking services and our Services (if you link our services to a Social networking service account or you interact with our profiles in Social networks). This may potentially include certain data from Facebook or other social networks (including access to your friends list as well as aggregated non-personal analytics data about our users) strictly in accordance with Facebook's and other networks' terms and conditions.

**g. When you participate in a game contest or survey organised by Unfrozen.** We collect, for example, your first and last name, date of birth, postal address and email. We use this data to organise the game contest or survey in question, send you promotional offers or perform internal statistics. In order to help us improve our Services and your experience, including by monitoring aggregate metrics such as total number of visitors, traffic, and demographic patterns;

**h. In order to get in touch with you** about features and offers relating to the Service that we think you would be interested in and to make sure that you get the most relevant offers and promotions based on your Advertising ID, use of the Service, and your preferences. You can opt-out of getting these electronic communications as described below.

## 5. NON-PERSONAL INFORMATION

We indirectly collect a variety of information through your interaction with and use of our Website and Services. This information may include, but is not limited to, anonymized browser and device information (both software and hardware), data collected through automated electronic interactions, application usage data, demographic information, geographic, geo-location information, statistical and aggregated information. Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal data.

## 6. PROCESSING DATA AS DATA PROCESSOR

In some cases, we receive your personal data as a data processor, which means that the data are controlled by our partners and we use them only in accordance with their instructions and applicable laws. We use this data in order to fulfil our obligation to you, improve the Services, and when processing is required in order to comply with a legal obligation to which we are subject.

## 7. NO PROCESSING OF SPECIAL CATEGORIES OF DATA

We do not collect or process any special categories of personal data. We do not undertake automated decision making or profiling on the data which are provided to us.

## 8. COOKIES

We use cookies and similar technologies like web beacons, pixel tags, or local shared objects (“flash cookies”), to deliver, measure, and improve our Services in various ways. A cookie is a small text file that identifies your computer on our server. Cookies in themselves do not identify the individual user, only the computer being used. Cookies are not used to gather personal information.

**Preferences and Features.** Cookies or similar technologies can tell us which language you prefer and what your communications preferences are. They can help you fill out forms on our Websites more easily. They also provide you with features, insights, and customised content.

**Marketing.** We may use cookies or similar technologies to help us deliver marketing campaigns and track their performance. Similarly, our partners may use cookies to provide us with information about your interactions with their services and action tags to measure advertising effectiveness and allow more effective targeted advertising, but use of those third-party cookies would be subject to the service provider’s policies.

**Performance, Analytics and Research.** Cookies or similar technologies help us learn how well our Websites and Services perform. We also use cookies or similar technologies to understand, improve, and research products, features, and services, also to create logs and record when you access our Website from different devices, such as your computer or your mobile device.

**Third Party Analytics Providers.** We may use third-party analytics providers software to allow us to better understand the functionality of our Website including but not limited to Google Analytics. This software may record information such as how often You use the Website. The information about your use of our Website, may be transmitted to and stored by Third-Party Analytics Providers’ servers, which may also be located outside of the EEA. We can use the cookies to help us develop and improve our Website. The information gathered and statistics, however, do not include details that can be used to identify you. By continuing to use our Website, you are accepting our use of these cookies that make advertising and communications more relevant to you and your interests, and further help us to improve the Website.

Because we respect your right to privacy you may choose to decline all cookies or to not allow some types of cookies. Click on the different category headings in Cookies Banner to find out more and change our default settings. However, blocking some types of cookies may impact your experience of the Website and the services we are able to offer.

## 9. HOW WE SHARE YOUR INFORMATION

For the performance of a contract with you, compliance with a legal obligation to which we are subject, and based on our legitimate interests, we may share your personal data with the following categories of third parties:

**Our Affiliates.** Our affiliates may access your personal data to help us develop, maintain and provide our Services and help manage our customer relationships.

**Service Providers.** Our service providers provide us support for our Services, including, for example, Website and application development, hosting, maintenance, backup, storage, payment processing, analysis and other services for us, which may require them to access or use personal data.

**Advertising and Advertising Measurement Partners:** we may share your email, nickname, IP address and other information you provide to us in order to facilitate targeting, delivery, and measurement of online advertising on third-party services, or otherwise facilitate the transmission of information that may be useful, relevant, or of interest to you.

**Professional Advisers.** Our lawyers, accountants, bankers, auditors and insurers may need to review your personal data to provide consultancy, compliance, banking, legal, insurance, accounting and similar services.

**Legal Authorities.** We may disclose your personal data if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, rule of a self-regulatory organisation or audit or to protect the safety of any person to address fraud, security or technical issues, or to protect our legal rights, interests and the interests of others.

**Business Partners.** We may share certain information such as your location, browser and cookie data and other data relating to your use of our Services with our business partners to deliver personalised advertisements that may be of interest to you. These third-party ad servers or ad networks use technology to send, directly to your browser, computer or mobile device, these personalised ads and ad links, and will automatically receive your IP address when they do so.

**Researchers.** To enhance the public understanding of patterns and trends in the markets served by our Service, we may provide personal data to third parties under confidentiality obligations such as, for example, academics or contractors for research purposes.

We may also share non-personal data (such as anonymous usage data, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain services or conduct independent research based on such anonymous usage data.

## 10. DATA TRANSFER

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

**International transfers to third-parties.** In addition, data may be transferred to our subsidiaries or processors in third countries or subcontractors of our processors in third countries. Some of the third parties described in this Privacy Policy that provide services to us under contract, are based in other countries that may not have privacy and data protection laws equivalent to those of the country in which you reside. In the event your personal information is transferred, stored or processed outside of

the EEA, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and GDPR.

## 11. YOUR RIGHTS

Depending on where you reside you may have rights to have access to your personal information (upon your request, we will provide you with a copy of your personal data in a structured, electronic format) and ask us to rectify (you can edit some of your personal data through your account, you can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate), erase (in certain territories you can ask us to erase or delete all or some of your personal data) and have right to data portability (if you ask us to do so, we will pass on your personal information in a structured, usable format to provide it to another administrator, as long as this is technically possible). You may also have rights to object to your personal information being used (if you object, we will no longer process your personal data unless there are compelling and prevailing legitimate grounds for the processing, or the data is necessary for the establishment, exercise or defence of legal claims), to ask for the transfer of personal information you have made available to us and to withdraw consent to the use of your personal information. You can exercise these rights directly with us by submitting a request at [info@unfrozen.studio](mailto:info@unfrozen.studio).

Subject to applicable law, you also have the right to restrict our use of information that constitutes your personal data for marketing purposes and lodge a complaint or direct questions to the data protection authority. If you believe that we have not processed your personal data in accordance with the applicable legislation, you may submit a complaint to the data protection authority through the website <http://www.dataprotection.gov.cy/>.

## 12. OPT-OUT OF DIRECT MARKETING

We may also process information that constitutes your personal data for direct marketing purposes, provided that you have a right to object to our use of your personal data for this purpose. You can withdraw your consent at any time by following the 'unsubscribe' link that is provided in emails from us or contacting us by emailing to [info@unfrozen.studio](mailto:info@unfrozen.studio).

Please note that even if you unsubscribe from all our personalised marketing emails, messages, or offers, we will still send you some notifications, for example to confirm purchases or changes in your Account, give warranty or security information, information about changes to the Terms of Use and Privacy Policy, as well as will show to you non-personalized marketing web offers. We will be able to stop all electronic communications only after your Account is deleted.

## **13. RESPONSE TIME**

We are obliged to respond to your requests without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons for such a delay. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you request otherwise.

## **14. DATA RETENTION**

We keep most of your personal data collected and processed for the purposes described in this Privacy Policy for as long as you continue to use our Services, e.g., you have an active Account. After the retention period, your personal information will either be securely deleted or anonymized and it may be used for analytical purposes. You must back up your data if you wish to keep it for longer.

We will delete your personal data after you request to delete your Account and the grace period of 90 (ninety) calendar days, during which we can restore your Account, expires. The process of erasing your personal data can take up to one month from expiry of the grace period and, considering the complexity and number of requests, may be extended by a further two months.

## **15. AGE RESTRICTION**

You may use the Services only if you are over the age of eighteen (18). We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. If we learn that we've collected personal data from a child under the age at which under the applicable law a child cannot give their own consent, we will take reasonable steps to delete it. Parents who believe that we may have collected personal data from a child can submit a request that it be removed, please contact us directly at [info@unfrozen.studio](mailto:info@unfrozen.studio).

## **16. AMENDMENTS**

We may change this Privacy Policy from time to time as laws, regulations and/or our business evolves. We will post the changes to this page and encourage you to review our Privacy Policy periodically to stay informed. If you have any questions about us, our Website, our Services or this Privacy Policy, please contact us by emailing to [info@unfrozen.studio](mailto:info@unfrozen.studio).