

**PRIVACY POLICY**  
**ALAWAR PREMIUM LIMITED**

Last updated: May 24, 2018

Alawar Premium Limited takes your privacy very seriously and treats all your Personal information (as this term is defined below) with great care. In order to guarantee your privacy, Alawar Premium Limited always acts in accordance with the applicable laws and privacy regulations.

This document sets out Alawar Premium Limited's Privacy Policy and applies to the Alawar Premium Limited Services (defined below) you are using. It is recommended that you read this Privacy Policy carefully.

**1. Who is Alawar Premium Limited?**

Alawar Premium Limited is a private company incorporated in Cyprus. Alawar Premium Limited specializes in the development, publishing and international distribution of free-to-play and midcore video games. These games are distributed through online websites, applications, stores and Alawar Premium Limiteds licensee and affiliate network (together with games "Services").

Alawar Premium Limited will be the data controller within the meaning specified in The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

Questions regarding this statement should be directed to the Alawar Premium Data Protection Officer by emailing [privacy@alawar.com](mailto:privacy@alawar.com) or writing at the following address:

Alawar Premium Limited  
Data Protection Officer  
P.O. Box 54024, 3720 Limassol, Cyprus

**2. What information does Alawar Premium Limited collect and process?**

Use of the Service

Alawar Premium Limited Services do not collect Personal information from your Device (as this term is defined below) when you browse our websites and request pages from our servers. This means that, unless you voluntarily and knowingly provide Alawar Premium Limited with Personal information, we will not know your name, your e-mail address, or any other Personal information. When you request a page from our websites, our servers log the information provided in the HTTP request header, JavaScript or similar technical tools, including the IP number, the time of the request, the URL of your request and other passive, technical, aggregated information. We collect such indirect and passive information through Technologies as further specified in Section Online Tracking Technologies in order to make our Services function correctly and provide you the functionality that you see on the Services.

Alawar Premium Limited may collect your Personal information in the following situations:

- When you are using Alawar Premium Limited's Services;

- When you download and/or register for one or more of Alawar Premium Limited's games;
- When you subscribe to Alawar Premium Limited's newsletters;
- When you purchase products or services through Alawar Premium Limited's websites, applications or within games ("in-game" purchases);
- When you request technical and/or customer support;
- When you create a personal account;
- When you otherwise use Alawar Premium Limited's Services where personal data is required for use and/or participation (e.g. for contest registration and/or prize acceptance).

In the sense of GDPR "Personal information" means any information that identifies directly or indirectly a particular individual, such as individual's name, postal address, e-mail, telephone number.

In the course of the abovementioned situations, Alawar Premium Limited may collect and process the following Personal information about you: your name, photo, email address, device ID, IP-address, user name, password, and other information that you provide us with when you fill in forms or when you register for Alawar Premium Limited's games as specified above. Alawar Premium Limited may also collect information regarding your use of the Services, such as the games you play, the pages you visit on the website, and the device(s) you use to access our Service.

You never have to answer any questions, and you can decline this exchange of information at any time. However, if you should choose to withhold requested information, Alawar Premium Limited may not be able to provide you with some of the Services dependent upon the collection of this information.

You are provided an opportunity on the Alawar Premium Limited websites to subscribe to a periodic newsletter. This newsletter is a marketing tool that allows Alawar Premium Limited to inform you of new products or services, as well as other news relevant to the company. The subscription service requires you to provide your email address. Your email address is not shared with any third party and will not be used to send you unsolicited communications. A link is provided to allow you to change your subscription preferences, including cancellation of your subscription.

#### Payment information

Credit Card and other payment information is not retained by Alawar Premium Limited as part of the registration process. This information is processed by our payment and billing providers during the purchase process and never disclosed to Alawar Premium Limited.

#### Link to social media

Alawar Premium Limited may use the information made publicly available, e.g. through YouTube, vk.com, Facebook, Instagram and Twitter, in order to find out your opinion about Services, to provide technical support, so that we could take them into account while improving our Services.

#### Automatically generated aggregated data

Alawar Premium Limited requires certain information in order for the Services to work as optimally as possible. That is why Alawar Premium Limited automatically collects generated data about your use of our Services.

This information may include, but is not limited to, browser and device information, 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.

### **3. Online Tracking Technologies**

When you use the Services, Alawar Premium Limited or third parties authorized by Alawar Premium Limited that provide content, advertising, or other functionality within the Services, may use cookies, pixel tags, local storage, mobile device identifiers and other technologies (“Technologies”) to automatically collect information through the Services. Alawar Premium Limited uses Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “Device”) that allow us to record certain pieces of information whenever you visit or interact with the Services, and to recognize, identify you across Devices and when you sign into the Services. Such Technologies also help Alawar Premium Limited, its partners to identify irregular Services behavior, prevent fraudulent activity, improve security, understand how our visitors use Services, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve the Services. The list of Technologies is specified below.

Analytics Cookies. Alawar Premium Limited uses third-party analytics providers, including, but not limited to, Google Analytics, and Yandex.Metrica (collectively “Third Party Analytics Providers”). These Third-Party Analytics Providers use Cookies on the Services. The information generated by the Cookies about your use of the Services may be transmitted to and stored by Third-Party Analytics Providers’ servers, which also may be located outside of the European Economic Area. On Alawar Premium Limited behalf, the Third-Party Analytics Providers will use this information for evaluating your use of the Services, compiling reports on the Services activity, and providing other services relating to your activity.

Alawar Premium Limited uses the following Google Analytics cookies:

\_ga (also known as \_rollupGa). The cookie is used to collect information and report website usage statistics. It expires after 2 years.

\_gid (also known as \_rollupGa\_gid). The cookie is used to distinguish users. It expires after 24 hours.

\_gat. The cookie is used to throttle request rate. It expires after 1 minute.

\_gac\_. This cookie contains campaign related information for the user. AdWords website conversion tags will read this cookie in an anonymous form. It expires after 90 days.

You can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout>. Further information can be found under

<http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service & Privacy). Please note that on our Services, Google Analytics code is supplemented by "gat.\_anonymizeIp();" to ensure an anonymized collection of IP addresses (so called IP-masking). Also, you can prevent Google Analytics to collect such data on behalf of Alawar Premium Limited by clicking on the following link: <https://tools.google.com/dlpage/gaoptout> .

Alawar Premium Limited uses the following Yandex.Metrica cookies:

\_ym\_isad. This cookie helps to check if Adblock is enabled in user browser. It expires after 24 hours.

\_ym\_uid. This cookie is used to collect information and report website usage statistics. Alawar Premium Limited uses these cookies to improve user experience. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. It expires after 2 years.

\_ym\_visorc. This cookie enables session replays. This cookie is used for Webvisor feature in Yandex.Metrica reports, which enables "Sessions replays" (<https://yandex.com/support/metrica/general/counter-webvisor.html>). Yandex ensures that all collected information is depersonalised. The cookie expires after less than 1 day.

Alawar Premium Limited uses also some additional Yandex.Metrica cookies with the following expiry terms: sync\_cookie\_csrf expires after 1 day, i expires after 10 years, yandexuid expires after 10 years, yp expires after 10 years, sync\_cookie\_ok expires after 2 days.

While you can disable Yandex.Metrica cookies through your browser settings, you can also block collection of any data related to you by going to <https://yandex.com/support/metrica/general/opt-out.html>.

Other Third-Party Identifiers. Alawar Premium Limited may also use advertising identifiers of third party advertising companies for recognizing your Device, serving ads on our behalf that may be relevant to your interests, understanding the usefulness to you of such ads, measuring advertising effectiveness, allowing more effective targeted advertising. Depending on your Device, you can choose to change or limit the transmission of your advertising identifier by going into your Device settings.

Social Media Widgets. Some of the Services include social media features such as the Facebook, vk.com "Like" button and other. These features may collect information including your IP address and which page you are visiting on our websites, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on the Services. Your interactions with these features are governed by the privacy policy of the company providing it.

#### **4. Third Party Websites**

Alawar Premium Limited does not control the information collection and distribution policies on Internet domains other than those Internet domains that are under the control of Alawar Premium

Limited itself. When you are on the Alawar Premium Limited websites, you may be directed to other sites that are beyond our control. These other sites may independently process data, solicit personal information, or send their own cookies to you. Alawar Premium Limited is not responsible for any use of the information including click-stream data created when using such third-party sites.

## **5. For what purposes will Alawar Premium Limited use information about you?**

Alawar Premium Limited may process your Personal information for the following purposes:

- To allow you to use the Services;
- To fulfill your specific requests, purchase orders and to send you purchase confirmation;
- To communicate with you about the Services and new products, upgrades etc.
- To configure the Services to your wishes and needs;
- For advertising and marketing purposes;
- For protection purposes and to generate anonymous statistical data.

Alawar Premium Limited does use the services of third parties, such as e-mail service providers, purchase and order processing merchants, web hosting, data management and storage service providers, marketing, advertising companies for delivery targeted advertisements, business partners providing services, products that you have requested or may be of interest to you that act as independent contractors on behalf of Alawar Premium Limited. These parties are contractually prohibited from processing Personal information for any purpose other than for performing legitimate contractual obligations or for complying with applicable legal requirements.

We do provide non-personal information to certain service providers for their use on an aggregated, anonymized basis for the purpose of performing their contractual obligations to us. We prohibit the sale or transfer of Personal information to entities outside of the Alawar Premium Limited's affiliates for their use without your approval.

In the event that all or substantially all of Alawar Premium Limited's stock and/or assets are transferred or sold to another entity, Alawar Premium Limited may transfer Personal information to the acquiring entity. If, as a result of such a business transition, your Personal information will be used in a materially different manner, you will be given choice consistent with our policy regarding notification of changes.

## **6. How does Alawar Premium Limited protect your Personal information?**

Alawar Premium Limited treats the information you provide to us as confidential information; it is, accordingly, subject to our company's security procedures and corporate policies regarding protection and use of confidential information. Alawar Premium Limited security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the information provided by our users. After Personal information reaches Alawar Premium Limited it is stored on a server with physical and electronic security features as customary in the industry, including utilization of login/password procedures and electronic firewalls designed to block unauthorized access from outside of Alawar Premium Limited. Because laws

applicable to Personal information vary by country, our offices or other business operations may put in place additional measures that vary depending on the applicable legal requirements.

Alawar Premium Limited takes steps to ensure that your information is treated securely and in accordance with Alawar Premium Limited Terms of Use and this Privacy Policy. Unfortunately, no data transmission over the Internet can be guaranteed secure. As a result, while Alawar Premium Limited strives to protect your Personal information, Alawar Premium Limited cannot guarantee the security of any information you transmit to Alawar Premium Limited or from our online products or services, and you use these services at your own risk.

## **7. Choices and Rights available to you**

You can always choose whether or not to disclose Personal information and that choice will not prevent you from using the Services. Please note, however, if you should choose to withhold requested information, Alawar Premium Limited may not be able to provide you with some of the services dependent upon the collection of this information.

You control which name, photo, email Alawar Premium Limited associate with your account. If they change, please modify the data in your personal account directly. Please inform Alawar Premium Limited if any of the Personal information we retain about you is inaccurate.

You can choose at anytime to opt out of receiving emails from Alawar Premium Limited or from having your Personal information shared with selected companies. If you want to opt out, you can do so by clicking on the link at the bottom of email sent to you. If you elect to "opt out" Alawar Premium Limited will not, as applicable, share your Personal information with third parties or send you emails.

Alawar Premium Limited reserves the right to send a one-time registration confirmation email, and infrequent Service Alert messages to users to inform them of specific changes that may impact their ability to use a service they have previously signed up for, regardless of email contact opt-in status. Alawar Premium Limited also reserves the right to contact you if compelled to do so as part of a legal proceeding or if there has been a violation of our Terms of Use or applicable licensing agreements.

You have the right to obtain deletion by Alawar Premium Limited of Personal information concerning you by deleting your account on the Services. If you request Alawar Premium Limited to erase your Personal information we will delete all Personal information about you, except for the data that are required for our compliance with the requirements of applicable laws (e.g. tax and accounting requirements) or for our detection, investigation and prevention of cheating in the products, Services and end user license agreement violations. Alawar Premium Limited will retain anonymous information after your account has been closed.

Alawar Premium Limited is retaining these rights because in limited cases we feel that we may need the right to contact you as a matter of law or regarding matters that will be important to you. These

rights do not allow us to contact you to market a new or existing service if you have asked us not to do so, and issuance of these types of communications are rare.

You may access and correct your Personal information and privacy preferences, opt out of receiving emails, newsletters, the sharing or retention of any Personal information, by writing at [privacy@alawar.com](mailto:privacy@alawar.com) or regular mail at Alawar Premium Limited P.O. Box 54024, 3720 Limassol, Cyprus.

To ensure that your request is honored, you must provide Alawar Premium Limited with information sufficient for us to accurately identify and access your records. The information we require is your full name and the email address you provided to Alawar Premium Limited when you requested Services or products. Alawar Premium Limited reserves the right to contact you to verify that we have accurately identified your record.

Where processing of your Personal information is based on legitimate interests according to Article 6(1)(f) of the GDPR, you can use your right to object at any time. If you object we will no longer process your Personal information unless there are compelling and prevailing legitimate grounds for the processing or the data is necessary for the establishment, exercise or defense of legal claims.

You also have the right to lodge a complaint at a supervisory authority.

## **8. Transfer of data to countries outside the EU**

For technical and operational reasons, information collected on the Services covered by this Privacy Policy is processed and stored in the United States and also in other countries where Alawar Premium Limited and its service providers conduct business. By providing information to Alawar Premium Limited you consent to the storage of your Personal information in these locations. All Alawar Premium Limited employees are aware of our privacy and security policies. Your information is only accessible to those employees who need it in order to perform their jobs.

## **9. Are minors permitted to use the Services?**

You may not use Alawar Premium Limited's Services unless you are over 13 years of age. If you are over 13 years of age, but under 18, you are required to obtain prior consent of your parents or legal guardians before using the Services. If you are under 18 years of age and have not obtained consent, you are not permitted to use the Services.

## **10. Can this Privacy Policy be changed?**

It is possible for the Privacy Policy to be amended in the future. That would then be mentioned on this page, so it is recommended to regularly have a look at this page.

## **11. Questions?**

Alawar Premium Limited takes and addresses its users' privacy concerns with utmost respect and attention. If you have any questions or believe that there was an instance of non-compliance with

this Privacy Policy with regard to your Personal information or you have other related inquiries or concerns, you may write or contact us at [privacy@alawar.com](mailto:privacy@alawar.com) or Alawar Premium Limited P.O. Box 54024, 3720 Limassol, Cyprus.

In your message, please describe in as much detail as possible the nature of your inquiry or the ways in which you believe that this Privacy Policy has not been complied with. Alawar Premium Limited will investigate your inquiry or complaint promptly.