

PRIVACY NOTICE

Last updated October 14, 2020

Introduction

Thank you for helping us with testing games at Broken Rules Interactive Media GmbH ("Company", "we", "us", "our"). We are committed to protecting your personal information and your right to privacy.

This is the privacy policy for User Testing of games at Broken Rules. While we strive to limit the amount of data we collect in our games as much as possible, we can not do so when we are testing games, of course, given that the purpose of testing is to find out how exactly you play our games as well as when and why they crash. We are sometimes using third-party backends – for example Unity Analytics and Apple TestFlight – for testing and those backends have their own privacy policies. We look at that data but are not interested in who it is connected to or in anything outside the game itself. We enable all options to anonymise your data that are possible and erase data as soon as we don't need it anymore. Still, data is being transferred and stored. Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

When you use our application (the "Game"), and more generally, use any of our services (the "Services", which include the Game), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately. And maybe also get in touch because we don't want anyone to not play our games for privacy-related reasons.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Game), as well as any related services, sales, marketing or events.

If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at yourdata@brokenrul.es.

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1. WHAT INFORMATION DO WE COLLECT?

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you start our Game. We are using Unity Analytics and have not added any additional data collection mechanisms.

We automatically collect certain information when you visit, use or navigate the Game. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, device name, country, location, information about how and when you use our Game and other technical information.

If you use our Game, we also collect the following information:

Unity Analytics Data. Unity has collected device information, like IP address and device identifiers, as well as events completed or actions taken within the game, including level, number of credits, time it took you to earn them, metadata about in-game communications and the value and details of purchases. Using our systems, the developer of the game has ongoing access to this data. The reason why we're collecting this data is in order to learn things like on what level people get stuck. A complete overview of the data collected can be found here: <https://unity3d.com/legal/privacy-policy>

Apple TestFlight Data. When we are using Apple's Beta-Testing solution TestFlight, Apple collects data and shares it with us. Crash logs and statistical information related to your use of each Beta App will automatically be provided to Apple and us. A complete overview of the data collected can be found here: <https://testflight.apple.com/#privacy-data>

Log and Usage Data. Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Game and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, and information about your activity in the Game (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use). This is basically a backup for the information described before – we just write a log file of things that happen in the game and sometimes in order to find out why something doesn't work those can be used to trace back the steps that led to a bug.

Mobile Device Data. We automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our Game, we may also collect information about your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID and information about the features of our Game you accessed. We might also collect device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings). The reason for this is that we want to know on what device exactly, for example a crash happens.

This information is primarily needed to support testing of our Game, for troubleshooting and for our internal analytics and reporting purposes.

2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Game for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive for testing and improvement of the Game and its Services.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share your data that we hold based on the following legal basis:

Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.

Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

4. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in the European Union. If you are accessing our Game from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in and other countries.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law. That means we will erase it as soon as the user testing phase of development is over.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 6 months.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Game is at your own risk. You should only access the Game within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

8. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Game, you have the right to request removal of unwanted data that you publicly post on the Game. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make

sure the data is not publicly displayed on the Game, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

9. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

10. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at yourdata@brokenrul.es or by post to:

Broken Rules Interactive Media GmbH
Museumsplatz 1/1/2
Vienna, Vienna 1060
Austria

11. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking here. We will respond to your request within 30 days.