

## Privacy Policy

Last updated: 24<sup>th</sup> July, 2017

Welcome to Kwalee.com (the “Site”), provided by Kwalee Ltd. (“Kwalee”). This Kwalee.com Privacy Policy (“Policy”) describes the information we gather from you when you use the Site, games, mobile and other applications made available by us and related services (together, the “Services”) and how we use, process, and disclose that information. By submitting personal information through, or using any of our Services, you expressly consent to the transfer of your personal information to our servers located in different jurisdictions, including but not limited to the United Kingdom, Canada, Australia, Ireland and the U.S., for our collection, use, disclosure, storage, processing, and handling in accordance with this Policy.

### **Information We Collect**

When you create an account or use our Service, we collect the following types of information from you:

- Registration information you provide when you create an account, including your first name and surname, country of residence, gender, date of birth, email address, phone number and username;
- Information you provide on our Sites and or by using our Services including data inputted or created while using our games, mobile, other applications and Services including gameplay data;
- Location information when you visit our Sites or use our Services including location information either provided by a mobile device interacting with our Site or associated with your IP address and device related information, where we are permitted by law to process this information;
- Any other information, such as photos, images, reviews, topics, content, and bio, you provide us.

If you create an account using, or otherwise connect your account to, a social networking services account (e.g. Twitter, Facebook or Game Center), we may also collect information provided to us by such social networking service including for example your: name; email address; birthday; geographic location; interests; profile picture; gender; networks; user ID; list of friends; likes, comments and any information you have made public and made accessible to us on such social networking account.

We automatically collect information about how you use our Services, for example, pages you have viewed, how you have used any of our applications. We also collect certain technical information about your device including your Internet protocol address, geo-location information, your browser type, language and identifying information, your operating system and application version, device types, device model and manufacturer, device identifiers, and your device operating system type and version.

We may also use cookies, web beacons, URL information and other technologies to gather information regarding the date and time of your visit and the information for which you searched and which you viewed. Cookies are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which usually stay on your computer until you delete them) to provide you with a more personal and interactive

experience on our Site. Web beacons are digital images that are used to log information on the Services or in our emails. We use Web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use Web beacons to tell if you open or act on our emails.

Others, including third party analytics service providers and advertising partners may also collect personally identifiable information about your online activities over time and across different web sites when you use our Services, including as described in this Privacy Policy. This Policy does not apply to and we are not responsible for those other parties. Third party analytics services may use cookies and web beacons through our Site (for example Google Analytics, ChartBeat, and Mixpanel). We may also use tools and services to provide us with information about how you use and interact with, and came to, our Site and the Services. We encourage you to review the privacy policies of these third parties to learn about your choices about information they collect from you.

We do not knowingly collect information from children who are under 13 years old.

### **Sharing of Your Information**

The Services may allow you to connect and share your actions, comments, content, profile, and information publicly or with other people. You may control some of the categories of personal information shared via your profile from the account settings menu. Please be mindful of your own privacy needs as you choose who to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others.

The Services may also provide you with the option to share certain information from your Kwalee account with social networking services like Facebook, Google, or Twitter. We are not responsible for the use or re-sharing by others of any of your information once it is made public. If you do not want your information to be made public, you should not use the Services in this manner and/or you should adjust your privacy settings on the applicable social networking service accordingly. We are not responsible for and we do not control these social networking services privacy practices. Please review the applicable privacy policy for information about how they use your information.

### **How Kwalee Uses Your Information**

Kwalee generally uses your information to:

- Facilitate the creation of and secure your account on the Services;
- Identify you as a user in our system;
- Provide, personalize, and improve the Services;
- Communicate with you about your use of the Services;
- Develop new products and services,
- Customize the advertising you view and recommend content;
- Fulfill your requests;
- Send newsletters, surveys, offers and promotional materials related to the Services and for other marketing purposes of Kwalee using your contact information;
- Protect, investigate, and prevent potentially fraudulent, unauthorized, or illegal activities;
- Protect our rights and the rights of other users; and
- As otherwise described in this Privacy Policy or in notices we provided to you.

We may also use your information to verify your geographic location. We may use your geographic location data to personalize our Service, to recommend content, determine whether the information you have requested is available in your location.

### **How Kwalee Discloses Your Information**

We may share your information as follows:

- We may share your personal information with your consent or at your direction. We may share your personal information to other players of our games, mobile and other applications to the extent that functionality is built into and is apparent from the use of the games and apps.
- We may also share your personal information with others who perform services on our behalf (for example third parties who perform data analytics with respect to gameplay on and through our Services).
- We may disclose your information if we believe we are required to do so by law, or to comply with a court order, judicial or other government subpoena, or warrant.
- We also may disclose your information if we believe doing so is appropriate or necessary to prevent any liability, or fraudulent, abusive, or unlawful uses or to protect Kwalee and our Services; or any rights, property, or personal safety of Kwalee or others.
- In the event that Kwalee is or may be acquired by or merged with another company or involved in any other business deal (or negotiation of a business deal) involving sale or transfer of all or part of our business or assets, we may transfer or assign your personal information and the agreement to this policy as part of or in connection with the transaction. Finally, in the event of insolvency, bankruptcy, or receivership, information may be transferred as a business asset.

We may also share aggregated and anonymized data with our partners, advertisers, and other third parties.

### **Third Party Advertisers**

We may permit advertisements to be delivered to you by third party Internet advertising companies (also called ad networks or network advertisers). These companies may use cookies, web beacons, platform device identifiers, software agents, and other technologies to collect non-personally identifiable information about your visits over time on our Service and across other websites to deliver advertisements to you targeted to your interests, measure their effectiveness and personalize advertising content, and to understand the usage and visitation of the Services and the other applications and websites tracked by these advertising companies. We do not have access to or control over cookies, web beacons, platform device identifiers, software agents, or other technologies that they may use. We are not responsible for the privacy practices of third party advertisers. You should check the privacy policy of the third party advertiser to determine how it handles information it separately collects from you. In addition, the Network Advertising Initiative offers information about some of the Internet advertising companies we may use.

### **Security**

Kwalee intends to take commercially reasonable steps to help protect your Information against loss, misuse and unauthorized access, or disclosure. No company can fully prevent security risks, however. And accordingly, we do not guarantee the security of your information.

### **Dispute Resolution**

If you believe that Kwalee has not adhered to this Statement, please contact Kwalee by e-mail at [privacypolicy@kwalee.com](mailto:privacypolicy@kwalee.com). We will try to address your concerns. If you feel that your complaint has been addressed incompletely, we invite you to let us know for further investigation.

### **Information Choices**

You consent to receiving promotional and other commercial electronic messages from kwalee. You may opt out of receiving such messages from Kwalee by following the instructions in those messages. . If you opt out, we may still send you non-promotional messages such as messages about your accounts or our ongoing business relations. You may also send requests about your personal information, including changes to your contact preferences, changes to or deletions of your information or content you post, and requests to opt-out of sharing your personal information with third parties by emailing [privacypolicy@kwalee.com](mailto:privacypolicy@kwalee.com). Please note that deletion of your information or content does not ensure complete or comprehensive removal of the content or information posted on the Services.

When you visit the Site, we and others give you the following choices about use of mechanisms for tracking, including tracking of your online activities over time and across different websites and online services by third parties. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies from our Site or from third parties. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Site. To opt-out of Google Analytics web tracking for certain browsers, you can download Google Analytics Opt-out Browser Add-on. You may opt out of other cookies that may be present on the Site by following the directions on Google's opt-out page, ScorecardResearch's opt-out page, and Quantcast's opt out page. You can also choose to opt-out of use of cookies by some of our third party advertising partners to deliver ads tailored to your profile and preferences. To find out more and opt-out click [here](#). However, while we and others give you choices as described in this policy, there are many ways in which Web browser signals and other similar mechanisms can indicate your choice to disable tracking, and our Site may not be aware of or honor every mechanism.

### **Access to and Corrections of Your Information**

You have the right to know what personal information Kwalee has about you and to correct any inaccuracies. Please direct any such requests by email to [privacypolicy@kwalee.com](mailto:privacypolicy@kwalee.com) or by one of the other means listed below under the heading "Kwalee Contact Information".

### **Changes and Updates to this Privacy Policy**

From time to time, we may revise the Policy. We will post any revisions on the Site. To help you stay current of any changes, we note the date the Policy was last updated above. Your continued use of the Services following the posting of any revision shall be deemed to be your acceptance of the said terms.

## **Kwalee Contact Information**

Please contact Kwalee with any questions or comments about this Policy, your information, our third-party disclosure practices, or your consent choices via [privacypolicy@kwalee.com](mailto:privacypolicy@kwalee.com).

You may also contact us at:

ATTENTION: Privacy Officer

Address: Kwalee Ltd., Juno Drive, Leamington Spa, CV31 3RG, United Kingdom

Telephone: +44(0) 1926 460002

Fax: +44 (0) 1926 801100