

# Privacy policy Last modified: October 28, 2021

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## 1. INTRODUCTION

WannaPlay Studio limited, develops and publishes games for mobile devices and social networks under the name WannaPlay Studio limited. "WannaPlay Studio", "WPS," or "we" or "us" refers to WannaPlay Studio limited and its contractors. WannaPlay Studio limited respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy applies whenever you play our games or otherwise access any of our other products, services, content, wannaplay.studio and /or other domains provided by WannaPlay Studio, together referred to as "**Services**." This Privacy Policy describes:

- what types of information we may collect or that you may provide;
- how we process, store, and use the information and with whom we share it;
- how you can access and update that information or request its deletion;
- the choices you can make about how we collect, use, and share your information;
- how we protect the information we store about you.

This Privacy Policy does not apply to any third party websites, services, or applications, even if they are accessible through any of our Services.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices and do not want WannaPlay Studio to collect, store, use, or share your information in the ways described, you should not play Game WannaPlay Studio 's games or use other WannaPlay Studio's Services.

By downloading, accessing and/or playing our games, or interacting with our websites or other Services, you agree to the collection and use of your information in accordance with this Privacy Policy, including consenting to WannaPlay Studio 's and our advertising partners' use of your data for targeted advertising purposes as described in the Marketing and Advertising sections of this Privacy Policy. If you have any concerns about providing data to us or having it used in any manner permitted in this Privacy Policy, you should not use our Services. As set out in the End User License Agreement relating to our Services, you must be at least 13 years old to access and/or use our Services.

## 2. ABOUT US

We are a company called **WannaPlay Studio limited** organized under the laws of **Cyprus, Greece**. Our registered office is **3026 Limassol, Arch. Makariou III, 155, PROTEAS HOUSE, 5 th floor, Cyprus**. We develop and distribute our games throughout the world in cooperation with other companies operating pursuant to a contract with **WannaPlay Studio**.

## 3. WHAT PERSONAL DATA WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting your personal data.

In each of the sections listed below, we describe how we obtain your personal data and how we treat it.

### 3.1 INDIVIDUAL CUSTOMERS

We collect personal data related to current, prospective, and former customers ("users") of our Services.

## A - SOURCES OF PERSONAL DATA

We may obtain your personal data from the following sources:

- a) from you directly (through the game, website or online forms); and/or
- b) from other entities, service providers that are assisting us in providing you with a service (including data analytics providers, operating systems, and internet services providers), or from your social networks accounts you used to sign in to our online services (for example, Facebook, Google, Game Circle, Weibo).

## B - PERSONAL DATA THAT WE COLLECT AND PROCESS

We may collect the following categories of personal data relating to our users:

- a) Contact information (such as name or nickname or email you submit as part of your register for our Services or log-in or via social networks);
- b) Data about your account and game progress, we create a Playrix-specific ID for you when you use the Services;
- c) Your IP address and unique mobile device identification numbers (such as your device ID, advertising ID, MAC address);
- d) Data about your device, such as manufacturer, operating system, CPU, RAM, browser type and language;
- e) Broad location data (e.g. country or city-level location);

- f) Precise geolocation data (GPS, with your consent);
- g) Usage data, such as data we collect with cookies and similar technologies Cookies Notice;
- h) Data (such as your nickname, profile picture) we receive if you link another provider's tool with the Service (such as Facebook, Google or Weibo);
- i) purchase history, including details of orders (amount spent, date, time, vouchers or offers used);
- j) Data to fight fraud (such as refund abuse in games or click fraud in advertising);
- k) Data from platforms that the games run on (such as to verify payment);
- l) Data for advertising and analytics purposes, so we can provide you a better Service;
- m) Your email address and your messages to the Services (such as chat logs and player support tickets sent by email or through Helpshift service (or another service we can use in the future) any feedback you submitted about your experience with us; and/or
- n) Other data you choose to give us.

## C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

Individual Customers

We may use your personal data to:	Our lawful basis for doing so is:
Provide you with our products or services (for example, play one of our online games and make online purchases)	Contract

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Establish and manage our relationship (including maintaining or servicing accounts, providing customer service, and making your experience with us personalised,)	Legitimate Interest	<ul style="list-style-type: none"> <li>Account Management</li> <li>Management Reporting (including at an intra-group level)</li> <li>Exercise or defend legal claims</li> </ul>
Learn about how our products and services are or may be used to verify or maintain the quality of, and improve, our products and services (for example, when we ask you to fill out surveys about the experience you had with us)		<ul style="list-style-type: none"> <li>Understand the market in which we operate</li> <li>Management Reporting (including at an intra-group level)</li> </ul>
Security (ensuring confidentiality of personal data, preventing unauthorised access and modifications to our systems and otherwise maintaining the security of personal data)		<ul style="list-style-type: none"> <li>Managing security, risk and fraud prevention</li> <li>Management Reporting (including at an intra-group level)</li> </ul>
Perform advertising or marketing services, including letting you know about our products, services and events that may be of interest to you by email or other forms of electronic communication		<ul style="list-style-type: none"> <li>Promote our goods and services</li> <li>Management Reporting (including at an intra-group level)</li> </ul>

If you object to us using your personal data for the above purposes, including direct marketing, please let us know using the email address provided in section 1.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

We do not knowingly collect or solicit personal data about or direct or target interest-based advertising to anyone under the age of 16 or knowingly allow such persons to use our Services. If you are under 16, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 16 may provide any personal data. If we learn that we have collected personal data about a child under age 16, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 16, please contact us.

## D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with the provision of service to you, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

### 3.2 REPRESENTATIVES OF OUR EXISTING OR PROSPECTIVE CORPORATE CUSTOMERS, BUSINESS PARTNERS, AND VENDORS

We may collect personal data related to employees, directors, authorised signatories, or other individuals associated with PLR's existing or prospective corporate customers, business partners, and vendors.

#### A - SOURCES OF PERSONAL DATA

We may obtain your personal data from the following sources:

- a) from you directly,
- b) from a company that employs you, if you are an employee of our existing or prospective customer, business partner, or vendor,
- c) during networking events that we have either hosted, or sponsored, or attended, including from entities conducting network events; and/or
- d) from publicly available sources and social media networks (for example, your company website or social media sites, such as LinkedIn).

#### B - PERSONAL DATA THAT WE COLLECT AND PROCESS

We may collect the following categories of personal data relating to our existing or prospective customers', business partners', and vendors' employees, officers, authorised signatories, and other associated individuals:

- a) name;
- b) business address;
- c) business email address;
- d) business telephone number; and/or
- e) job title.

#### C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide you with our products or services or receive products or services from you	Legitimate Interest	<ul style="list-style-type: none"><li>• Efficiently fulfil our contractual and legal obligations</li><li>• Management Reporting (including at an intra-group level)</li></ul>
Establish and manage our relationship		<ul style="list-style-type: none"><li>• Efficiently fulfil our contractual and legal obligations</li><li>• Account Management</li><li>• Understand the market in which we operate</li><li>• Management Reporting (including at an intra-group level)</li><li>• Exercise or defend legal claims</li></ul>
Learn about how our products and services are or may be used		<ul style="list-style-type: none"><li>• Understand the market in which we operate</li><li>• Management Reporting (including at an intra-group level)</li></ul>
Security		<ul style="list-style-type: none"><li>• Managing security, risk and fraud prevention</li><li>• Management Reporting (including at an intra-group level)</li></ul>
Let you know about our products, services and events that may be of interest to you by email or other forms of electronic communication		<ul style="list-style-type: none"><li>• Promote our goods and services</li><li>• Management Reporting (including at an intra-group level)</li></ul>

If you object to us using your personal data for these purposes, including direct marketing, please let us know using game's Help & Support tool or via the email provided in section 1 above.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

## D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your business relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

### 3.3 WEBSITE VISITORS

We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our website, including but not limited to email mailing lists, interactive services, posting material); and/or
- b) from your device or browser through internet service providers, operating systems and platforms, and data analytics providers.

If you contact us, we may keep a record of that correspondence.

## B - PERSONAL DATA THAT WE COLLECT AND PROCESS

- a) browser type;
- b) information on the use of our website (for example, pages visited, geographical location, time spent on the website, online transactions);
- c) cookie data (for more information please see our Cookie Notice);
- d) preferences regarding online marketing; and/or
- e) IP address.

## C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

Website Visitors

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide our website services to you	Legitimate Interest	<ul style="list-style-type: none"><li>Website Management</li><li>Promote our goods and services</li><li>Account Management</li></ul>
Establish and manage our relationship		<ul style="list-style-type: none"><li>Understand the market in which we operate</li><li>Management Reporting (including at an intra-group level)</li><li>Account Management</li></ul>
Learn about our website(s) visitors' browsing patterns and the performance of our website (s), including to verify or maintain the quality of, and improve, our website, products and services		Website Management
Security (including ensuring confidentiality of personal data, preventing unauthorised access and modifications to our systems and otherwise maintaining the security of personal data)		<ul style="list-style-type: none"><li>Managing security, risk and crime prevention</li><li>Management Reporting (including at an intra-group level)</li></ul>
Perform advertising or marketing services, including letting you know about our products, services and events that may be of interest to you by email or other forms of electronic communication		<ul style="list-style-type: none"><li>Promote our goods and services</li><li>Management Reporting (including at an intra-group level)</li></ul>
Learn about how our products or services may be used, including to verify or maintain the quality of, and improve, our products and services		<ul style="list-style-type: none"><li>Understand the market in which we operate</li><li>Management Reporting (including at an intra-group level)</li></ul>

If you object to us using your personal data for the above purposes, including direct marketing, please contact with us using the email address in section 1.

Where we use cookies or similar technologies we will seek your prior consent wh ere required to do so by law.

Where we use your email to communicate marketing information to you we will seek your prior consent wh ere required to do so by law.

**D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We will keep your personal data only for as long as is necessary for the purposes for which it was collected in connection with your requests via our website or your use of our website.

**3.4 VISITORS TO OUR PREMISES**

**A - SOURCES OF PERSONAL DATA**

We may obtain your personal data from you directly and from our records in our operating systems and platforms.

**B - PERSONAL DATA THAT WE COLLECT AND PROCESS**

- a) name;
- b) business contact details;
- c) organisation;
- d) role;
- e) time and date of your visit; and/or
- f) image (for example, from CCTV cameras at our premises).

**C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?**

Visitors to our Premises

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Security	Legitimate Interest	Managing security, risk and crime prevention
Maintain records of visitors to our premises	Legitimate Interest	Management Reporting

If you object to us using your personal data for the above purposes, please let us know using the email address provided in section 1.

**D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We keep your personal data for as long as necessary to ensure security of visitors to our premises and as soon as it is no longer necessary, usually after 90 days, we delete it.

**4. WHO DO WE SHARE YOUR PERSONAL DATA WITH**

Our Partner Organisations and Service Providers

We may disclose information about you to organisations that provide a service to us, ensuring that they are contractually obligated to keep your personal data confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) technical support providers who assist with our website and IT infrastructure,
- b) software providers, including ‘software as a service’ solution providers, wh ere the provider hosts the relevant personal data on our behalf;
- c) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers;
- d) providers that help us generate and collate reviews in relation to our goods and services;

e) our advertising and promotional agencies and consultants and those organisations or online platforms selected by us to carry out marketing campaigns on our behalf and to advertise their own products or services that may be of interest to you. A list of our partners is available through [this link](#); and/or

f) service providers that assist us in providing our services.

Law enforcement or government bodies

We may disclose your personal data as permitted by law in order to investigate, prevent or take action regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of our Terms and Conditions or other agreements, or as required by law.

## 5. FOR USERS IN THE EUROPEAN UNION AND BRASIL

**A. Legal Basis for Processing.** Our legal basis for collecting, using, and sharing your personal information will depend on the purpose for which we use your personal information. Typically, we will rely on the following legal bases for processing your personal information: (i) your consent; (ii) where our processing is in our legitimate interest or in the legitimate interest of our Ad Partners or Service Providers; or (iii) where our processing is necessary to perform a contract with you (e.g. to make the Games or Websites accessible to you). If we rely on your consent to process your personal information, you have the right to withdraw your consent at any time.

**B. Your Personal Information Rights.** If you would like to exercise your rights of access, rectification, erasure, restriction of processing, data portability, and/or your right to object to the processing of your personal information, please follow the instructions described in Section 14. If you would like to opt-out of your personal information being shared with our Ad Partners, please contact us at [feedback@wannaplay.studio](mailto:feedback@wannaplay.studio).

**C. Transfer of Personal Information Outside of the EU and Brazil.** Because our Service Providers are located in countries outside of the European Union and Brazil, your personal information will be transferred to other countries that may not offer the same level of data protection as the laws of your country of residence. We rely on model contractual clauses for such transfers.

**D. How to File Complaints.** If you believe your rights under the GDPR have been violated, you may lodge a complaint with the supervisory authority of your country of residence. For contact information for your supervisory authority, please [visit here](#).

## 6. YOUR RIGHTS UNDER THE GDPR

You are entitled to obtain information from us on how we handle your personal data, to see copies of all personal data held by us and to request that your personal data is amended, corrected or deleted from our systems. You can also limit it, restrict or object to the processing of your data.

We do not carry out any decision-making based solely on automated processing, including profiling.

If you gave us your consent to use your data, e.g. so that we can send you marketing emails or display personalised ads, you can withdraw your consent at any time. Please note that even if you withdraw your consent, we can still rely on the consent you gave as the lawful basis for processing your personal data before you withdrew your consent.

You can object to our use of your personal data where we stated we rely on our legitimate business interests to do so. We explained the legitimate interests we rely on in sections 'Why do we collect your personal data and what are our lawful bases for it?' above.

If you want to review, delete, or change the information WannaPlay Studio has about you or have additional questions, e-mail us at [feedback@wannaplay.studio](mailto:feedback@wannaplay.studio). Please note that certain records, for example those related to customer service matters, will be held for legal and accounting purposes.

## 7. LEGAL BASIS

Every time we collect and process your information, we do so in accordance with one of the following legal basis:

- Contractual Necessity—for data we use to provide you with Services you have requested;
- Legal Obligation—for data we use to comply with our legal obligation or to respond to a lawful request for information;
- Legitimate Interest—for data we use for purposes that are not harmful to your privacy and can be reasonably expected from the context of your use of our games and Services, such as analytics, research, marketing, advertising, and continuous improvement of our games and Services; and
- Consent—you consent to collection of data when you install our games and you can withdraw your consent at any time by uninstalling our games.

This Privacy Policy explains some way of opting out of certain types of information collection and processing. However, if you continue to play our games and use our Services, we will still collect some personal information about you. If you do not want us to collect any personal information about you, you should stop playing our games and using our Services.

## 8. OUR POLICIES CONCERNING CHILDREN

Our Services and websites are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. Children under 13 should not use our websites or games at any time. If we learn we have inadvertently collected or received personal information from a child under 13, we will take reasonable measures to promptly remove that information from our records. If you believe we might have any information from or about a child under 13, please contact us at [feedback@wannaplay.studio](mailto:feedback@wannaplay.studio).

## 9. INTERNATIONAL OPERATIONS AND TRANSFERS OF INFORMATION

*We store your information on servers, which are primarily based in Germany. We may also use servers and engage providers that are located outside the EEA, including in the United States and Russia, in order to process and store your information and to provide services to us.*

*As part of our international operations, we may transfer data from time to time to affiliated entities or third parties to jurisdictions outside the EEA. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to the places where your information is transferred to or stored may be different from the privacy laws applicable in the country where you reside. We take steps to ensure that there are adequate safeguards and mechanisms in place to allow the transfer of your information across borders outside of the EEA.*

**WannaPlay Studio** keeps your information for so long as your account is active. We deem an account to be active for a period of 24 months from the last interaction with our games or Services. **WannaPlay Studio** will also retain information for as long as it deems necessary for the purposes described in this Privacy Policy or to comply with its legal obligations.

## 10. DATA SECURITY

We have implemented appropriate measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure, and we are committed to the protection of customer information. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy by us and our suppliers who process personal information on our behalf.

Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## 11. CHANGES TO OUR PRIVACY POLICY

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

## 12. CONTACT INFORMATION

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [feedback@wannaplay.studio](mailto:feedback@wannaplay.studio)