

## **BadFly Interactive Privacy Policy**

Your privacy is important to us. So we've developed a Privacy Policy that covers all information how we or any of our partners may collect, use, disclose, transfer, and store your information while you are playing our games on different platforms. We would like to notify that BadFly Interactive is not collecting any personal data itself. Nevertheless, while playing our games some of your personal data can be collected via our third-party partners and shared by us in order to serve you better and improve our games.

Please take a moment to familiarize yourself with all privacy practices related to playing our games and [let us know](#) if you have any questions.

### **1. Definitions related to BadFly Interactive Privacy Policy**

*The customer* is the person who downloaded our mobile version games, bought our games for other platforms or visited our online websites, forums, and chats. Also, the customer refers to GDPR's definition of a data subject .

*Personal data* means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

*The third party* means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

*Data Controller* means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

*The processor* is the entity that processes data on behalf of the Data Controller.

### **2. Who is BadFly Interactive?**

BadFly Interactive, a.s. is a company developing and publishing games for different types of devices such as PC/Mac, Android/iOS, XboxOne/PS4 and VR. BadFly Interactive a.s. creates games that are published through different platforms and ad technologies owned by different third-party partners, such as publishers and ad controllers. When customers play games developed by BadFly Interactive, the third-party publishers and add controllers may collect certain personal data about the players,

such as name, email address, IP address, phone number, home address, birth date, mobile phone number, information from customers profile at SNS and other personal or non – personal information.

**Our contact information:**

**BadFly Interactive, a.s.**

**VAT: 03300897**

**Address:** Jaktáře 1475, Mařatice, 686 01 Uherské Hradiště

**Country:** Czech Republic

**3. What personal data does BadFly Interactive, a.s. use?**

BadFly Interactive may use customer´s personal data, such as server log files, web beacon, cookies, and tracking pixels. Other technologies that we may request from our third-party partners is used to analyze certain types of information, include cookies, IP addresses (including for purposes of determining customer´s approximate geographic location), mobile device ID or other identifiers, browser types, browser language, information passed from customers browser, referring and exit pages and URLs, platform type, the number of clicks, information about customer´s media, peripheral hardware, software and/or applications installed on device, domain names and types, landing pages, pages viewed and order of those pages, the date and amount of time spent on particular pages, other Internet and website usage information, game state and the date and time of activity on BadFly Interactive websites or games, information about how customers use the game, including game metrics and statistics, feature usage and purchase history. These processings are necessary for the performance of a contract or for the purposes of the legitimate interests pursued by the controller.

BadFly Interactive may also access customer´s personal data thanks to customer´s active consent, provided BadFly Interactive through:

A, Email communication

B, subscription via Mailchimp e-commerce tool.

BadFly Interactive, a.s. may share some of the customer´s personal data collected by third-party partners tools only with the customer´s active consent provided BadFly Interactive´s third-party partners.

BadFly Interactive may use, store and analyze the customers personal data, based on the customer´s active consent, for performance of a contract or for purposes of the legitimate interests pursued by the controller to be able to:

- Provide them with new products, features, enhancements, special offers, upgrade opportunities and adverts that suits customer´s needs and profile the best.
- Provide them with any services or functionality related to our customer´s support;
- Inform them about news, promotions or events;
- To track the use of our websites and apps and collect statistics to help us learn more about gaming preferences and understand the tendencies of the market, and provide customers

with in-game offers and notifications for a purpose of enhancing customer gaming experience;

- Protect against cheating or fraud, or other security breaches;
- Determine the jurisdiction in which you are located so we can determine what of laws apply to you;
- To troubleshoot technical problems for authentication purposes, and tailor the updates for our games and to ensure proper functionality of BadFly Interactive products and services.

The certain ways how the collection of which information is applied towards to all BadFly Interactive customers within the certain platform and BadFly Interactive´s game, and how the customers can opt-out of this collection are listed below.

We will store your personal data for the period required by the laws valid in the Czech Republic.

#### **4. Personal data collected by our third-party partners.**

##### **Apple Inc.**

You may be asked to provide your personal data to Apple Inc. or to any Apple affiliated company while playing the **mobile version of our games downloaded from iTunes Apple Store**. Apple and its affiliates may share this personal information with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

Apple may collect and store following customer´s personal data:

- Information regarding customer activities on their website, iCloud services, their iTunes Store, App Store, Mac App Store, App Store for Apple TV and iBooks Stores and from their other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest.
- Details of how you use their services, including search queries. This information may be used to improve the relevancy of results provided by Apple services. Except in limited instances to ensure the quality of our services over the Internet, such a information will not be associated with customers IP address.
- With your explicit consent, they may collect data about how you use your device and applications in order to help us to improve our apps (games).

Apple takes the security of our customer's personal data very seriously. Apple online services such as the Apple Online Store and iTunes Store protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by Apple, they use computer systems with limited access housed in facilities using physical security measures. iCloud data is stored in an encrypted form including when they utilize third-party storage.

To learn more about how Apple Inc. collects and uses customers personal data and how to change your privacy settings while using their services, sites, and applications you can find in the link below:

<https://www.apple.com/legal/privacy/en-ww/>

## **Google**

You may be asked to provide your personal data to Google or to any Google affiliated company while playing the **mobile version of our games downloaded from Google Play Store**. Google and its affiliates may share this personal data with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

Information that Google collects and how it is used depends on how you use their services and how you manage your [Google privacy settings](#).

When you are not signed in to a Google Account, Google collects the data using the unique identifiers associated with the browser, application, or device you are using. When you are logged in, Google also collects the information and store them on your Google Account and treat it as personal information.

Google collects information about the apps, browsers, and devices you use Google to provide customers with features such as automatic service updates or screen mute when customer get batteries. The information gathered includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including operator name and phone number, and application version number. They also collect information about how customers apps, browsers, and devices interact with their services, including IP addresses, crash reports, system activity, and date, time, and URLs referencing the source of your request.

Google collects this information when the app downloaded from Google Play Store on your device contacts our servers or when the service checks the availability of automatic updates. If you use an Android device with Google apps, your device regularly contacts Google's servers to provide device information and connections to our services. This information includes device type, operator name, crash reports, and installed applications.

Based on the information Google collects, they improve the security and reliability of their services. This includes detecting, preventing and responding to fraud, misuse, security risks, and technical issues that could harm Google, our users, or the public.

Google use different technologies to process information for these purposes, such as the automated systems to analyze content so they can provide customers with search results, personalized ads, or other features tailored to how you use their services. They also analyze content to detect abuse, such as spam, malware, and illegal content. Google also use algorithms by which they recognize patterns in data. Depending on your account settings, your activity may be associated with your personal data on other sites and other apps, in order to improve Google's services and ads that Google displays.

To learn more how Google use your information and how you can protect your privacy, please click on the link below:

<https://policies.google.com/privacy>

## **Valve Corporation**

By creating a Steam account and playing our **PC/Mac and VR version games using Valve's Corporation online sites, products, and services** you provide your personal data to Valve Corporation or any Valve affiliated company. Valve and its affiliates may share this information with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

The Valve Corporation may use personally identifiable information provided by customers to send them information about Valve, including news about product updates, contests, events, and other promotional materials, but only if the users agree to receive such communications. Valve will not share any personally identifiable information with third parties such as BadFly Interactive for marketing purposes without your consent.

When you create a Steam account, Valve collects a customer's email address and username, and at the customer's option, first and last name. Depending on customers settings, you agree that some of this information may be searchable and available to other users within Steam. Valve has no obligation to keep private personally identifiable information that a customer makes available to other users via Steam or other Valve software, such as in multiplayer chat or other public functions.

The Valve Corporation may release personal data to comply with court orders or laws that require us to disclose such information. In the event of a reorganization, sale or merger they may transfer personally identifiable information to the relevant third party with the customer's consent if required by law.

Valve gives customers the option to receive promotional email communications from Valve. Customers may opt out of these communications.

Personally identifiable information provided to Valve will be collected, processed and stored by Valve Corporation in the United States. Valve has taken reasonable steps to protect the information customers share with them, including, but not limited to, setup of processes, equipment, and software to avoid unauthorized access or disclosure of this information.

To learn more how Valve Corporation collects and uses our customer's data by using their sites, products, and services you can find in the link below:

[https://store.steampowered.com/privacy\\_agreement/](https://store.steampowered.com/privacy_agreement/)

## **Microsoft**

While playing **our console version games using Microsoft** online sites, products, and services you provide your personal data to Microsoft or to any Microsoft affiliated company. Microsoft and its affiliates may share this information with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

While playing our console version games published on **Xbox Store** or **Xbox Live**, Microsoft as our third-party partner may automatically collect data on how you use Xbox, such as:

- What games you play, game and result statistics, purchased items and acquired content if you log in and log out.
- Performance data for your Xbox, your device, and your network connection, including any hardware and software errors that may occur.

- If you are using an Xbox with a Kinect sensor, it's Kinect Sensor data.

To learn more how Microsoft collects customers' personal data by using their sites, products, and services and how to opt-out, you can find in the link below:

<https://privacy.microsoft.com/cs-cz/privacystatement>

### **Sony Interactive Entertainment**

While playing **our console version games** published on Sony Interactive Entertainment online sites, you provide your personal data to **Sony Interactive Entertainment** or any Sony-affiliated company. Sony Interactive Entertainment and its affiliates may share this information with each other and use it consistent with their Privacy Policy. They may also combine it with other information to provide and improve their products, services, content, and advertising.

While playing our console version games published by Sony Interactive Entertainment, this third-party partner may automatically:

- Access and store information about your use of that game on your device, including for offline games (see the 'Consoles and other devices' section of their Privacy Policy); and
- Log your activity on their game servers.
- Receive device and Account identifiers, such as PlayStation Network Online ID and Account ID information, and information about how you use our online games, which players you play against, when you jump over a hurdle or complete a task, when you move between areas on a map and how long you spend in an area.

To learn more how Sony Interactive Entertainment collects customers personal data by using their sites, products, and services and how to opt-out, you can find in the link below:

<https://www.playstation.com/en-gb/legal/privacy-policy/>

## **5. Who is the third-party data controller in BadFly Interactive's games?**

### **Unity Ads controller**

BadFly Interactive, a.s. enables third-party ad controller **Unity Ads** to collect some personal data such as gameplay and device data in order to optimize player's game experiences and serve the players with personalized ads based on their in-game behavior while **playing free-to-play mobile games**. Unity Ads collects data such as device type, country, device language, in-game behavior and purchases, IP address, Apple's Advertising Identifier (IDFA), and Google Play advertising ID. This information helps BadFly Interactive tailors games and it helps Unity Ads to provide our customers with the ads designed for specific device types, player languages, and game preferences. As the Unity is committed to the responsible collection and use of player data, they enhance their privacy safeguards towards all our customers. On a game-by-game basis, customers are able to opt-out any time of data collection. Also, **Unity Ads** provides all our customers with an access to Unity's [Privacy Policy](#) to change their privacy setting any time they see an ad. Each time a Unity ad appears in a game, customers are able to access and change their privacy setting via the Info "i" icon on the Unity ad.

Players who opt-out of data collection will still see the ads, but these ads will be random and not tailored to the customer (player). Also, on a per-game basis, the customer's data will be deleted.

## **6. Information and data used within BadFly Interactive PR, advertising and other promotional campaigns**

As BadFly Interactive, a.s. would like to inform its customers (players), worldwide media and the game reviewers about the most important news, production, special offers and the events we are part of, we are using the certain marketing and e-commerce tools to be more recognizable within the gaming industry and gaming market. These PR and marketing tools are not providing BadFly Interactive with any of customer's personal data. Nevertheless, some of them may collect, store and use customer's personal data in order to serve us with the reports evaluating the effectiveness of our campaigns.

And what tools do we use to inform you and to be more recognizable?

### **MailChimp e-commerce tool**

BadFly Interactive, a.s. uses the service of the PR and Marketing tool called MailChimp within the web site <http://www.mailchimp.com> provided by The Rocket Science Group LLC d/b/a MailChimp. BadFly Interactive uses their e-commerce tool to send the news about BadFly Interactive to its customers, media, and reviewers email addresses, in the form of bulk emails, based on their active consent granted in the form of subscription or a single request, they provided BadFly Interactive within passed campaigns or by filling the request on BadFly Interactive company website that is forwarded to email address [support@badflyinteractive.com](mailto:support@badflyinteractive.com). The tool also provides BadFly Interactive with the report related to campaigns effectiveness. Data shared with BadFly Interactive does not personally identify any of our subscribers. BadFly Interactive, a.s. uses MailChimp to provide customers with the news, special offers, giveaways, newsletters with the updates on the gaming industry and our products or to invite customers to our events and meetups.

Every email sent through the MailChimp e-commerce tool will provide the customer with the active opt-in and opt-out option in order to decide whether they want to receive the other emails PR and marketing related BadFly Interactive news. The customer may change their mind about receiving such an email anytime and opt-out thanks to the active unsubscribe option, that is available in every BadFly Interactive's email. BadFly Interactive may store and use subscriber's email addresses in order to be able to improve marketing services, campaigns, and gaming products.

While BadFly Interactive use of the MailChimp e-commerce tool, MailChimp may collect, store and analyze some of the subscriber's personal data noted within [MailChimp privacy policy](#) in the section **"5. Information we collect"** and specifically in the paragraph called "(g) **Information from other sources"**, such as demographic information, device information (such as IP addresses), location, and online behavioral data (such as information about subscriber's use of social media websites, page view information and search results and links).

Mail Chimp uses this information, alone or in combination with other information they collect, to enhance their ability to provide relevant marketing data and reports to BadFly Interactive and to develop and provide BadFly Interactive with more relevant marketing and PR tools, features, and services. For example, they use this information to develop Social Profiles, a tool that helps BadFly

Interactive learn about their subscribers and allows BadFly Interactive to distribute more relevant content, that customer's, media and reviewers are interested in.

## **7. Information disclosed in BadFly Interactive's online chatrooms, blogs, and forums**

Information that BadFly Interactive online site's participant discloses in any online chatrooms, blogs, message boards, users' profiles or in similar forums on BadFly Interactive sites is considered to be public information. The participants should be aware of that any personally identifiable information submitted in the course of these public activities can be read, collected or used by other users of these forums. BadFly Interactive is not responsible for the personally identifiable information, that participants make public voluntarily.

## **8. Policy Regarding Children**

The customers need to be aware of the specific age rating valid in their specific country, that is stated in the description of our games, such as ERSB, PEGI, USK ratings. We do not knowingly allow anyone under the stated specific age rating to use our services and play our games. If you are under the age rating stated in the game description and valid for your country, please do not send us any information about yourself, including your name, address, telephone number or email address. Should we learn that we have inadvertently collected personal data from an underage user, we will delete that information as soon as possible. If you believe that we might have any information about an underage user, please contact us at [support@badflyinteractive.com](mailto:support@badflyinteractive.com).

## **9. Security of your information**

BadFly Interactive implements reasonable security measures to protect the security of customer data both online and offline. BadFly Interactive takes reasonable precautions against possible security breaches of customer databases and records but cannot guarantee that unauthorized access, hacking, data loss or other breaches will never occur. The players of BadFly Interactive games and all participants on our online sites should be aware that transmission of information over the internet is not completely secure, so BadFly Interactive cannot guarantee the security of all data while it is being transmitted.

To prevent fraudulent activities and behaviors that may negatively affect the experiences of a player, BadFly Interactive is authorized to use "anti-cheating" software or applications for the prevention of fraud for BadFly Interactive internet presence, during the use of online products and mobile platforms.

BadFly interactive is authorized to change the Privacy Policy whenever it deems necessary. The changes must be publicized on <http://www.badflyinteractive.com> properly.

## **10. Transfer personal data to third countries (EU customers)**

We only transfer our customer's personal data to our third-party partners which has appropriate privacy policies. Personal data transferred to USA are processed by companies which are in compliance with EU-U.S. Privacy Shield Framework.

## **11. THE RIGHTS OF THE SUBJECTS OF PERSONAL DATA AND THEIR APPLICATION (EU CUSTOMERS)**

### **Right to access personal data**

You have the right to get confirmation from our company regarding whether and which personal data are processed for individual purposes.

### **Right to correct personal data**

If the personal data we have are incorrect or incomplete, you have the right to request that this data be updated and corrected.

### **Right to delete personal data**

You have the right to have your personal data deleted if it is no longer necessary for the purposes, for which it was processed, if you believe that it was processed illegally or you had revoked your consent with processing the personal data for the given purpose in the past.

### **Right to restrict the processing of personal data**

You have the right to restrict the processing of your personal data if you do not want your personal data to be deleted and you ask that it be archived for example, due to the exercise and defence of legal entitlements, if its processing is illegal, your personal data is incorrect or you objected to it and it is not clear whether your authorized interest outweighs our authorized interest.

### **Right to the transferability of personal data**

You have the right to request for your personal data in the form of a structured, regularly used and machine legible format for cases of handing over your personal data to another Administrator.

### **Right to object against the processing of personal data**

You have the right to object with the processing of your personal data if they are processed in the Administrator's authorized interest. If you object to direct marketing purposes, your personal data will no longer be processed for this purpose.

### **Right to revoke your consent with processing personal data**

If you have provided us consent with processing your personal data for the purposes for which the consent is required, you have the right to revoke it at anytime, as described above.

### **Application of rights**

To apply your rights, please turn to:

- client support email: [support@badflyinteractive.com](mailto:support@badflyinteractive.com)
- We will reply to your requests within 30 days of receipt.

## **12. RIGHT TO FILE A COMPLAINT AT A SUPERVISORY AUTHORITY (EU CUSTOMERS)**

If you have any questions regarding the protection of personal data at BadFly Interactive, a.s., please contact our client services: [gdpr@badflyinteractive.com](mailto:gdpr@badflyinteractive.com)

Also, you have the right to file a complaint at a supervisory authority if you believe that there has been a breach to the rules during the processing of your personal data with the general EU regulation for the protection of personal data 2016/679 (GDPR) and the valid Czech legislation.

The Office for Personal Data Protection:

Pplk. Sochora 27

170 00 Prague 7

Telephone: +420 234 665 111