

Draft data privacy statement of astragon Entertainment GmbH

I. General information

Welcome! Thank you for your interest in our game. We are astragon Entertainment GmbH, Am Wehrhahn. 33, D-40211 Düsseldorf. You can contact us at: info@astragon.de

Our commitment

Protecting your privacy is of utmost importance to us. Therefore, complying with the statutory data privacy regulations forms a natural foundation of our day-to-day work. It is, however, moreover paramount to us that you at all times know which personal data we gather, why we gather it, and how we process it. We will be happy to explain to you what rights you have and how to exercise them, as well.

What is personal data?

To put it briefly, anything whereby you, as an individual, can be identified, whether due to the information itself or in connection with other information. Examples of this include your name, e-mail address, or also a customer ID, but even the point in time at which you visit our website if that is saved together with your IP address. We constantly endeavour to gather as little personal data as possible. Simultaneously, we are informing you in this document, in depth, on your personal data, if we gather any.

Why is this document so long?

The legislative authority requires us to describe the following to you in regard to all personal data individually:

- which personal data we gather (= the nature of the data gathered)
- which law or ordinance or regulation permits us to do so (= the legal basis)
- why we gather said data (= the intended use)
- what exactly happens to your data (= the nature of the processing)
- how long we save your personal data
- what rights you have in regard to your personal data (= the rights of data subjects)

We need to list all the steps individually. This is why this document is very extensive.

1. Controller and Corporate Data Protection Officer

Responsible within the meaning of the EU General Data Protection Regulation (GDPR) are we, the company

astragon Entertainment GmbH

Am Wehrhahn. 33, D-40211 Düsseldorf

info@astragon.de

If you have any **questions regarding data protection** please contact our **Corporate Data Protection Officer**. Our Corporate Data Protection Officer is

Benjamin Wolf

datenschutz@astragon.de

2. Legal basis

We gather and process personal data based on the most up-to-date European law. You will find the entire legal basis specified below in the General Data Protection Regulation (GDPR). Depending upon the purpose for gathering the data, one or more of the legal bases below will apply:

- Consent pursuant to **Art. 6(1)(a) General Data Protection Regulation (GDPR)**.
Consent is a declaration of intent. This can be given in writing in the form of a statement, or also by way of any other clearly affirmative action. In whatever way the consent is given, it needs to be given voluntarily, apply to a specific case, and unmistakably express that the data subject is in agreement with the processing of the personal data concerned. For that purpose, the data subject needs to be adequately informed and understand the consent.
- The necessity of fulfilling the contract or taking preparatory measures pursuant to **Art. 6(1)(b) GDPR**
This means: The data is necessary so that we can fulfil the contractual obligations towards you or we need the data to prepare for concluding an agreement with you.
- Processing to fulfil legal obligations pursuant to **Art. 6(1)(c) GDPR**
This means: The processing of the data is, for example, mandatory for us based on a law or other regulation.
- Processing in order to preserve legitimate interests pursuant to **Art. 6(1)(f) GDPR**
This means: The processing of the data is necessary in order to, on the one hand, preserve legitimate interests on our part or on the part of a third party, as long as your interests or basic rights and basic freedoms, which make the protection of personal data necessary, do not outweigh the latter.

3. Rights of data subjects

As far as your personal data is concerned, you are the data subject. You have the following rights in regard to the processing of data by us in the scope in accordance with the respective article of the General Data Protection Regulation cited:

- **The right to information** pursuant to Art. 15 GDPR
- **The right to correction** pursuant to Art. 16 GDPR
- **The right to deletion ("Right to be forgotten")** pursuant to Art. 17 GDPR
- **The right to limit the processing** pursuant to Art. 18 GDPR
- **The right to data portability** pursuant to Art. 20 GDPR
- **The right of opposition** pursuant to Art. 21 GDPR

Notwithstanding any other legal remedy under administrative or judicial law, you are entitled to file an appeal with a supervisory authority, in particular in the EU Member State that is your place of residence, your place of work or the place of the presumed infringement if you are of the opinion that the processing of the personal data concerned infringes the GDPR.

4. Deletion of data and duration of storage

The personal data of the data subject is deleted or blocked once the purpose of the storage lapses. It may, moreover, be stored beyond that time if this has been stipulated by the European or national legislative authority

in EU ordinances, laws or other regulations to which the Controller is subject. The data may also be blocked or deleted if a storage period stipulated by said standards expires, unless the necessity for further storage of the data for concluding an agreement or fulfilling an agreement exists.

II. Specific data processing

1. Firebase

a) Scope of the data processing

This game uses Firebase, a web analysis service of Google Ireland Limited. ("Google"). The software „FireBase“ was developed by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as "Google"). This software gathers information on how you use the game and creates various statistics from that. The usage data gathered in particular includes the specific selection of menu items or functions, the time spent on the game or in individual menus or missions, and the sequence in which you used the functions of the game, as well as the frequency of playing the game. This data is gathered together with your IP address. The IP address transmitted by your browser within the context of Firebase is not merged with other data of Google.

We have activated the so-called IP anonymisation in this game, i.e. the IP address is first truncated by Google within Member States of the European Union or in other contracting states of the Agreement on the European Economic Area, prior to being transmitted on to the USA.

Only in exceptional cases is the full IP address transmitted to a server of Google in the USA and truncated there. Google itself describes its data processing activity here: <https://www.google.com/policies/privacy/>.

b) Legal basis

The legal basis for the processing of the data when using the game is Art. 6(1)(f) GDPR.

The legitimate interest within the meaning of Art. 6(1)(f) GDPR lies in a customer-orientated design of the game, which does justice to the user's requirements and takes the user's usage preferences into consideration.

The legal basis for the passing on of the data to Google is Art. 28(3) and Art. 45(3) GDPR. The service provider is certified under the Privacy Shield Framework and is therefore subject to the adequacy decision (Implementing Decision 2016/1250) of the European Commission, i.e. the level of data protection with the service provider is recognised as being equivalent to that stipulated by the GDPR, even though the service provider has its registered office in the USA.

c) Purpose of the data processing

The processing serves the purpose of analysing our games and the usage pattern of the respective players.

d) Duration of the storage

The data is already anonymised directly after being gathered. Personal data is therefore only gathered in the course of the transmission, and not permanently.

e) The possibility of objection and deletion

You may prevent the cookies from being saved, including the generation and transmission of data to Google, by deactivating "Firebase" in the game settings.

2. Facebook

While playing the game you can get connected to your Facebook profile. Because of this connection the following data collected by Facebook will be provided to astragon: e-mail address; the public profile, (first and last name, if filed at Facebook, profile photo, sex and age); list of friends also using game apps. By creating a link to your Facebook profile, you agree that the data is processed and transferred for these purposes. astragon has no influence on how Facebook uses the collected data. We refer to the following privacy policy: <https://www.facebook.com/about/privacy>.

3. Google Analytics

a) Scope of the data processing

This game uses Google Analytics, a web analysis service of Google Ireland Limited. ("Google"). This software gathers information on how you use the game and creates various statistics from that. The usage data gathered in particular includes the specific selection of menu items or functions, the time spent on the game or in individual menus or missions, and the sequence in which you used the functions of the game, as well as the frequency of playing the game. This data is gathered together with your IP address. The IP address transmitted by your browser within the context of Google Analytics is not merged with other data of Google.

Google Analytics uses cookies - text files stored on your video game console, allowing for an analysis of the way you use the game. The information generated by the cookie on your use of this game is usually transferred to a server of Google in the USA and saved there.

We have activated the so-called IP anonymisation in this game, i.e. the IP address is first truncated by Google within Member States of the European Union or in other contracting states of the Agreement on the European Economic Area, prior to being transmitted on to the USA.

Only in exceptional cases is the full IP address transmitted to a server of Google in the USA and truncated there. Google itself describes its data processing activity here: <https://www.google.com/policies/privacy/>.

b) Legal basis

The legal basis for the processing of the data when using the game is Art. 6(1)(f) GDPR.

The legitimate interest within the meaning of Art. 6(1)(f) GDPR lies in a customer-orientated design of the game, which does justice to the user's requirements and takes the user's usage preferences into consideration.

The legal basis for the passing on of the data to Google is Art. 28(3) and Art. 45(3) GDPR. The service provider is certified under the Privacy Shield Framework and is therefore subject to the adequacy decision (Implementing Decision 2016/1250) of the European Commission, i.e. the level of data protection with the service provider is recognised as being equivalent to that stipulated by the GDPR, even though the service provider has its registered office in the USA.

c) Purpose of the data processing

The processing serves the purpose of analysing our games and the usage pattern of the respective players.

d) Duration of the storage

The data is already anonymised directly after being gathered. Personal data is therefore only gathered in the course of the transmission, and not permanently.

e) The possibility of objection and deletion

You may prevent the cookies from being saved, including the generation and transmission of data to Google, by deactivating "Google Analytics" in the game settings.

4. Game Analytics

a) Scope of the data processing

This game uses GameAnalytics. GameAnalytics was developed by GameAnalytics ApS, Vesterbrogade 34, 4th floor, DK-1620 Copenhagen V, Denmark (hereinafter referred to as "GameAnalytics"). You can view the applicable data protection policy of GameAnalytics under the following link: <http://www.gameanalytics.com/privacy> This software gathers information on how you use the game and creates various statistics from that. The usage data gathered in particular includes the specific selection of menu items or functions, the time spent on the game or in individual menus or missions, and the sequence in which you used the functions of the game, as well as the frequency of playing the game. This data is gathered together with your IP address. The IP address transmitted by your browser within the context of GameAnalytics is not merged with other data.

GameAnalytics uses cookies that are stored on your end device allowing the analysis of your user behavior. The information generated by the cookie will also be stored by GameAnalytics abroad, in particular on servers in Denmark and the United States of America. You can prevent the storage of cookies used by Game Analytics by refusing cookies in the "Settings" section of your device. In this case, however, the functionality of your app may be severely restricted.

b) Legal basis

The legal basis for the processing of the data when using the game is Art. 6(1)(f) GDPR.

The legitimate interest within the meaning of Art. 6(1)(f) GDPR lies in a customer-orientated design of the game, which does justice to the user's requirements and takes the user's usage preferences into consideration.

The legal basis for the passing on of the data to Google is Art. 28(3) and Art. 45(3) GDPR. The service provider is certified under the Privacy Shield Framework and is therefore subject to the adequacy decision (Implementing Decision 2016/1250) of the European Commission, i.e. the level of data protection with the service provider is recognised as being equivalent to that stipulated by the GDPR, even though the service provider has its registered office in the USA.

c) Purpose of the data processing

The processing serves the purpose of analysing our games and the usage pattern of the respective players.

d) Duration of the storage

The data is already anonymised directly after being gathered. Personal data is therefore only gathered in the course of the transmission, and not permanently.

e) The possibility of objection and deletion

You may prevent the cookies from being saved, including the generation and transmission of data to Google, by deactivating "GameAnalytics" in the game settings.

5. AdMob (Lite Version)

a) Scope of the data processing

This game uses AdMob a marketing service of Google Ireland Limited. ("Google"). This Software plays ads in our free Lite Version. Those ads can be personalized. The IP address transmitted by your browser within the context of AdMob is not merged with other data of Google.

We have activated the so-called IP anonymisation in this game, i.e. the IP address is first truncated by Google within Member States of the European Union or in other contracting states of the Agreement on the European Economic Area, prior to being transmitted on to the USA.

Only in exceptional cases is the full IP address transmitted to a server of Google in the USA and truncated there. Google itself describes its data processing activity here: <https://www.google.com/policies/privacy/>. For more information on how Google uses the collected information, please visit the "How Google uses data when you use our partners' sites or app" page: <https://www.google.com/policies/privacy/partners/>.

b) Legal basis

The legal basis for the processing of the data when using the game is Art. 6(1)(f) GDPR.

The legitimate interest within the meaning of Art. 6(1)(f) GDPR lies in a monetarisation of the game which does justice to the user's requirements and takes the user's usage preferences into consideration. The legal basis for the passing on of the data to Google is Art. 28(3) and Art. 45(3) GDPR. The service provider is certified under the Privacy Shield Framework and is therefore subject to the adequacy decision (Implementing Decision 2016/1250) of the European Commission, i.e. the level of data protection with the service provider is recognised as being equivalent to that stipulated by the GDPR, even though the service provider has its registered office in the USA.

c) Purpose of the data processing

The processing serves the purpose monetarizing a free game.

d) Duration of the storage

The data is already anonymised directly after being gathered. Personal data is therefore only gathered in the course of the transmission, and not permanently.

e) The possibility of objection and deletion

You can opt-out from AdMob by Google service by following the instructions described by Google Inc.: <https://support.google.com/ads/answer/2662922?hl=en>.

6. Feedbackbutton

a) Scope of the data processing

Within the app we offer the option to give feedback on the app itself or to ask for help when having technical problems within the app. When this button is pressed the default mail program will be opened on your device and an email template will be opened addressed at us. There you can add your own text. Apart from that some files will be attached automatically. Log files, Event logs, Device Specs and all your screenshots you have taken inside the game recently or since the last report. Those files include the following data:

Device Specs (Device Type, OS, Resolution, Device Generation, System Memory, Processor Type & Count, Graphic Device Name, Vendor Version, Graphic Device Memory Size)

Last Error Message

Order of the last events (e.g. what was skipped within the last mission, skips with the vehicles, etc.)

When you send this mail, it will be delivered to us and saved accordingly. Those dates are: Your name, your Email address, your individual text and the files mentioned above. Automatically we will also save date and timestamps Alternatively – if you do not have a default mailing program installed – you can use the contact button to send the aforementioned files to us to receive a PIN which you can then use to contact us via email with the pin as the topic so that we are able to link it to the files. In this case all the personal data transmitted within this mail will be saved to solve the issue at hand.

b) Legal Basis

The legal basis for the processing of the data when using the game is Art. 6(1)(f) GDPR.

The legitimate interest within the meaning of Art. 6(1)(f) GDPR lies in a customer-orientated design of the game, which does justice to the user's requirements and takes the user's usage preferences into consideration and by means of communication with the customer in case of technical problems.

c) Purpose of the data processing

The processing serves the purpose of communicating with the user on his request and in individual cases to analyze technical issues within the game.

d) Duration of storage

The data will be saved as long as it takes to resolve the request of the user and will only be used in the course of the transmission. Longer only if we are legally obliged to do so.

e) The possibility of objection and deletion

The user can revoke his consent to processing his data at any time or object to further processing. If the user contacts us via mail, he can object at any time. A deletion can only be performed if there are no legal requirements forcing us to store the data for certain periods. In this case the data will be locked for any other usage and the conversation cannot be continued.

7. Do we gather personal data if you play our games on a mobile phone or tablet?

When you use our games on a mobile phone or tablet with the Google Android or Apple iOS operating systems, we do not gather any additional personal data. Please infer whether, and to what extent, personal data is gathered and processed by Apple or Google in the context of using the games from the respective data privacy policies of the relevant provider. This may in particular be the case if you use the convenience functions of Apple or Google that are integrated into the game, e.g. logging in to the Game Center, saving game statuses, etc. We have no access to such data that is gathered by Apple or Google.