# **Privacy Policy**

#### Introduction

This Privacy Policy describes how we collect, use, and protect your personal data while using our website and mobile game (hereinafter referred to as the "Service"). We strive to ensure compliance with applicable data protection regulations, including the General Data Protection Regulation (GDPR).

#### **Data Controller**

The data controller for your personal information is Tolga Kartal, based at:

ul. Wajdeloty 1/1, 80-437 Gdańsk, Poland

Email: info@devideal.com

#### What Data Do We Collect?

When using our Service, we may collect the following personal data:

- 1. Data provided by the user:
  - Name and surname,
  - Email address,
  - Information provided in contact forms or during registration.
- 2. Technical data and analytics-related information:
  - o IP address,
  - Device data (e.g., brand, model, operating system),
  - o Cookies and other activity-related data.
- 3. Game-related data:
  - Number of game attempts, progress, and results,
  - Start, end, and duration of gameplay sessions.
  - Types of transactions and purchases made using virtual items in the game,
  - Country of the device's location,
  - o Time, date, and source of the game's installation,
  - Ads viewed,
  - o Error and bug reports.

## Why Do We Process Your Data?

We process your personal data for the following purposes:

- To provide and ensure the proper functioning of the Service,
- To handle user inquiries and communications,
- To personalize content and improve the quality of the Service,
- To process in-app purchases,
- To analyze statistics related to Service usage,
- To fulfill legal obligations (e.g., accounting, taxes).

## **Legal Basis for Data Processing**

All data processing activities are based on one of the following legal grounds:

- Consent: For cookies, newsletter subscriptions, or personalized advertisements. You can withdraw consent at any time without affecting the legality of prior processing.
- Contract: We process data necessary to provide the Service, such as account management or in-game purchases.
- Legal obligation: We store data to comply with legal requirements, such as accounting, tax regulations, or fraud prevention.
- Legitimate interest: For statistical analysis, fraud prevention, improving the Service, or responding to user inquiries.
  When relying on legitimate interest, we assess whether our actions do not infringe on your rights and freedoms.

#### **Data Retention**

We retain your personal data as long as necessary to fulfill the purposes outlined in this Privacy Policy, including providing the Service or complying with legal, accounting, or reporting obligations. Periodically, we may delete inactive accounts or anonymize related data.

## **Data Sharing**

We do not share your personal data with third parties without your consent, except when:

- Necessary for the provision of the Service (e.g., hosting services, payment operators),
- Data sharing occurs with partners for statistical purposes (under a data processing agreement),
- Required by law.

#### Your Rights

You have the right to:

- 1. Access your personal data and obtain a copy,
- 2. Rectify inaccurate or incomplete data,
- 3. Request data deletion,
- 4. Restrict data processing,
- 5. Transfer your data to another controller,
- 6. Object to data processing,
- 7. Withdraw consent for data processing (where applicable),
- 8. File a complaint with a supervisory authority (in Poland: President of the Office for Personal Data Protection).

#### Cookies

We use cookies on our website to improve the quality of the Service and analyze website traffic. Cookies are small text files stored on your device that enable us to:

- Remember your preferences (e.g., language, account settings),
- Analyze website usage via tools like Google Analytics,
- Support social media features,
- Run targeted ad campaigns tailored to your interests.

You can manage your cookie settings in your browser, where you can block or delete cookies. Please note that disabling cookies may affect the functionality of our website.

## **Advertising**

We may use third-party service providers to display advertisements that help operate and maintain our Service. When personalized advertising is enabled, these partners may use browsing history to determine which ads to show you. Necessary tracking data and cookies will also be used to support personalization when this option is enabled.

## **Data Security**

We take all technical and organizational measures to protect your personal data from unauthorized access, loss, or destruction.

#### **Service Providers**

We may engage third-party companies and individuals to facilitate our Service, provide the Service on our behalf, perform Service-related activities, or assist us in analyzing Service usage. These third parties have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. Your data may be processed by the following categories of entities:

- Hosting and server providers,
- Electronic payment operators,
- Analytics providers (e.g., Google Analytics),
- Advertising networks (e.g., Google Ads, Facebook Ads).

All third-party entities are required to comply with data protection principles outlined in data processing agreements.

#### **Transparency**

We are committed to full transparency in processing your personal data. Below is a summary of data categories, processing purposes, and retention periods:

- Technical data (e.g., IP address, device data): Stored for up to 6 months for traffic analysis and security purposes.
- Game-related data (e.g., progress, scores, purchase history): Stored during the use of the Service and up to 2 years after the last activity to address claims.
- Contact data (e.g., email, name): Stored during the relationship with the user and up to 2 years afterward for query handling.
- Financial transaction data: Stored for the period required by law (e.g., 5 years for accounting purposes).

If you have questions about data retention, contact us at info@devideal.com.

# **Changes to the Privacy Policy**

We reserve the right to modify this Privacy Policy. Any changes will be published on this page, and significant changes will be communicated to you appropriately (e.g., via email).

## Contact

If you have any questions regarding this Privacy Policy, please contact us at: Email: info@devideal.com

Last Updated: November 29, 2024