

Privacy Statement Sparkling Society

Who is Sparkling Society?

Sparkling Society Games B.V. and its affiliates (together “Sparkling Society”) is a developer of games with the ambition to engage players into fans, i.e. “members of the sparkling society”. Sparkling Society focuses on the development of games for players of 16 years and older. You can find more information about us and our activities on our website www.sparklingsociety.net.

Privacy is very important to us. In this Privacy Statement we explain which personal data we process. You can be sure that we take the greatest care in this matter. And we explain the purposes (reasons) for which we use personal data. This Privacy Statement applies if you visit our website, download or play our game(s). You can save our Privacy Statement [[download Privacy Statement](#)].

Information in your savegame

By playing the game information will be collected and saved in the savegame. With this we mean information about how users play the game on the basis of their game behaviour and the features a user receives. The information we save in the savegame doesn't contain personal data.

Personal data

With personal data we mean data that says something about you, and by which a person can be either directly or indirectly identified. Examples of personal data include your name, e-mail or home address, age and data of birth. Your phone number and IP-address are also personal data.

Personal data that we process and what we use it for

We process various types of personal data for different purposes. The overview below outlines the purposes for which we process personal data.

Personal Data	Purposes
<i>General customer data: Username and password IP address Friendcode</i>	<ul style="list-style-type: none">• We use this data for customer service activities. If you have questions or problems with for example login or you have lost data we can help you.• We use this data for activities related to the game.• We use this data to inform you about new and improved products and activities which improve the gaming experience. We use this data also to make targeted offers.• We segment data for performing targeted marketing activities.• Research, development and improvement of the games.• Promoting security, preventing fraud and cheating.
<i>Age & gender</i>	If you choose to share this data with us we will save this data.
<i>Contact details and personal data of customers/potential customers. First name and surname and e-mail address.</i>	We use this data for sending newsletters to people who have registered to receive the newsletters.
<i>Transaction data</i>	<ul style="list-style-type: none">• We use this data for customer service activities. If you have questions or problems with for example login or you have lost data we can help you.
<i>Accountprofiles</i>	We use Accountprofiles for performing marketing activities, to show ads that match

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Accountprofile is Savegame information supplemented with personal data such as IP address, e-mail address, age and gender.	personal preferences and interests and to keep track of which ads you've already seen.
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On what basis do we process your data?

We are not permitted to simply request or use your data. The regulations state that we may only do so if there is 'a basis for processing'. This means that we may use your data for one or more of the following reasons:

- **Executing the agreement**

We need data in order to conclude an agreement, for example if you download a game you conclude an agreement with us.

- **Legitimate interests**

We may use your data in connection with our 'legitimate interests', for example for sending certain messages and/or to inform you about other games and for improving security, preventing fraud and cheating. However, we have to be able to demonstrate that our interests in the use of your data outweigh your right to privacy. We therefore carefully weigh up all of the interests.

- **Consent**

We process your data based on the consent that you have given, for example for sending newsletters. You may revoke this consent at any time. Beside we build an Accountprofile using the data and information that you provide to us.

Kids

You need to have a certain age to play our games. Players up to 16 years old are considered as kids and do not belong to our target group. If kids do play our games with the permission of their parents or guardians, we will treat them with extra care and will not send interest-based ads.

Security of your data

We do our utmost to keep your data secure. Among other things, we have taken the following technological and organisational measures for dealing with your personal data:

- We have secured our systems, and we continue to invest in our systems, procedures and people.
- We ensure that our work methods are aligned with the sensitivity of your data.
- We train our people to handle your data securely.
- All of our employees have signed a confidentiality agreement.
- Personal data are only accessible within a protected environment.

How long do we keep your data?

We keep personal data for as long as we need it for the following stated purposes:

- **Personal data of users** – we keep this data for up to two (2) years after the termination of inactivity, unless we are legally obliged to keep it for longer.
- **Personal data relating to financial administration** – we keep this data for up to seven (7) years unless we are legally obliged to keep it for longer.
- **Other data** – we only keep other personal data for as long as it is required for the purposes for which it was intended. We delete personal data as soon as it is no longer needed for the purposes for which we process it.

Do we share your personal data with third parties?

We use service providers who carry out work for us and process your data. We only provide them with the personal data necessary for them to perform the services, such as sending newsletters via e-mail. We select these companies carefully and conclude processing agreements with these parties. These processing agreements stipulate what these parties may do with personal data, how they must secure the data and when the data must be deleted.

Do personal data go to countries outside the EEA (European Economic Area)?

Personal data which we receive from you can in some cases be passed to countries outside the EEA. In principle we only pass personal data to countries with an appropriate protection level. In case there

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is not an appropriate protection level we take care of appropriated safeguards. Such as concluding model contracts that are approved by the European Commission.

Your rights

Inspection, correction, erasure, limitation and deletion:

- You have the right to request an overview of your data that we use.
- If your data is incorrect, you can ask us to rectify the data and we will do so as quickly as possible.
- In certain cases, you can ask us to delete your personal data. Please contact us through the details given below.
- You can object to profiling.
- If you don't want to receive newsletters, offers for games and services you can unsubscribe. This can easily be done in every message.
- If you don't want to receive personalized ads in the game you can withdraw your consent in het setting menu or by sending an e-mail to privacy@sparklingsociety.net. Be aware that you will receive general ads.
- Would you like to receive the data that you have given to us, and that we have automatically saved for the implementation for an agreement? This is possible, but only if we process your data on the basis of consent, or on the basis of the agreement that we have concluded with you. This is called 'data portability'.
- You can also ask us to temporarily limit the use of your personal data, for example in the following instances:
 - you believe that your personal data is incorrect,
 - we are making improper use of your personal data,
 - we want to delete your personal data but you still need it (for example, after the retention period).

Questions or have you noticed something?

If you have a question about this Privacy Statement or if you have noticed something, please feel free to contact us by sending an e-mail to us: privacy@sparklingsociety.net. We look forward to assisting you. If you are not happy with the way we've handled your data, you can submit a complaint using the contact details at the end of this Privacy Statement. You are also entitled to file a complaint with the Dutch Data Protection Authority.

Changes to this Privacy Statement

This Privacy Statement was adopted on June 23, 2020. We may update our Privacy Statement from time to time.

Contact details

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