



RP GRAND PRIVACY POLICY

Version No. 1 of 06.06.2024

We are committed to protecting and respecting your privacy. This Privacy Policy (“**Policy**”) describes how we collect, process, use and share your personal information when you download and play our games and use our websites, applications and other products.

By “**Personal Data**”, we refer to data that relates to you as an identified or identifiable natural person. The term “Personal Data” may include, for example, your name, your postal address, your telephone number, your e-mail address, your age, your gender, and your game preferences. Anonymous or de-identified information, which we are not able to identify you, does not qualify as “Personal Data”.

The provisions of this agreement may be revised unilaterally by RP Grand in all parts. The Executor in its turn undertakes to reflect all changes on this page indicating the date of the last change.

1. CONTROLLER’S NAME AND CONTACT DETAILS

1.1. The data controller in respect of our Products (as defined below) is: GRAND GAMES AV SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, Chairman Of The Board: Valery Trayan, Legal Address: UL. SOLIPSKA 3 / 5, 02-482 WARSZAWA, Contact phone: +48515616217, NIP: 5223230320, REGON: 522529564, KRS: 0000981193, legal@rpgrand.com.

1.2. In this Policy, “RP Grand”, “we”, “us” or “our” means GRAND GAMES AV SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ and the term “Products” means:

a) our PC and mobile games that post a link to this Policy and are made available through the Sites and game platforms such as iOS and Android (the “Games”).

b) Our websites that post a link to this Policy, including those at:

- <https://rpgrand.com/>

- <https://rpgrand.com/forum>

- <https://rpgrand.com/wiki>

c) RP Grand account (“**Account**”) and any other online game, website, application and product operated by us that posts a link to this Policy.

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

2.1. For questions regarding this Policy, our data practices, or our compliance with applicable laws, please contact our Data Protection Officer as follows: support@rpgrand.com.

3. GENERAL INFORMATION IN BRIEF

3.1. We process Personal Data only when necessary for the performance of a contract with you, for compliance with a legal obligation to which we are subject, or based on our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms for which require the protection of your Personal Data.

3.2. Our legitimate interests are to render and improve our Products in an effective, safe and harmless manner. We want to provide everyone with a fair and balanced experience when using our Products.

4. INFORMATION SECURITY

4.1. We maintain reasonable and appropriate security safeguards designed to protect your information from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the information.

5. PROCESSING INFORMATION BY THIRD PARTIES

5.1. We may share Personal Data with our affiliates, subsidiaries, vendors or agents working on our behalf for the purposes described in this Policy. For example, we may hire companies to assist with protecting and securing our systems or Products. Any vendor or agent that we retain must comply with our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose unless so instructed by us. Those companies may be located

outside of the European Economic Area. **Read more in Section 7 “How we share your information”.**

6. DATA RETENTION

6.1. We keep most of your Personal Data collected and processed for the purposes described in this Policy for as long as you continue to use our Products, e.g. you have an active Account in RP Grand.

7. INFORMATION WE COLLECT

7.1. In relation to your use of our Products, we collect information either directly from you (when you provide information to us) or indirectly (e.g. through our Products technologies).

7.2. When creating an Account, you may be asked to provide your Personal Data, but not limited to, your game nickname, game password and email address. Immediately after creating an Account, you may provide your date of birth to receive birthday gifts, and link your Account to your phone number to use two-factor authentication or receive marketing messages via SMS. You may also use your credentials from other services such as Google, Facebook, AppStore, Google Play and others to expedite the creation of an Account with us.

7.3. We may obtain your Personal Data when you register for and use our other Products, e.g. game forums, chats, or when you provide feedback about our Products. These data include:

a) Information that you post, comment, share content or like in any of the Games-related forums owned or operated by RP Grand (“Forums”), on the pages of social network groups operated by RP Grand, and on the Sites;

b) Information sent through the “game-chat” functionality in the Games, including through in-Game voice chat;

c) Information you provide when you request information or support from us or purchase a product or service from us, including information necessary to process your orders with the relevant payment merchant, which may include the amount of any transaction, **but will not include your financial information**, which will only be submitted directly to the payment merchant under secure protocols;

d) Information other than the Account Data you provide to us when participating in competitions, contests, tournaments, loyalty programs, at offline events, responding to surveys, e.g. your contact details;

8. INFORMATION WE COLLECT INDIRECTLY

8.1. We indirectly collect a variety of information through your interaction with and use of our Games, Sites and other Products.

8.2. This information may include, but is not limited to, anonymized browser and device information (both software and hardware), data collected through automated electronic interactions, application usage data, demographic information, geographic, geo-location information, statistical and aggregated information (“Other Information”). Statistical or aggregated information does not directly identify a specific person, but it may be derived from Personal Data. For example, we may aggregate Personal Data to calculate the percentage of users in a particular country. If Other Information is combined with Personal Data, we will treat the combined information as Personal Data.

9. GAME-RELATED INFORMATION

9.1. In order to provide you with efficient services, we need to collect, store and use various information about your use of our Games. “Game-Related Information” are stored under your RP Grand ID as well as what is usually referred to as “game statistics”. By “game statistics” we mean information about your Games preferences, progress in the Games, participation, performance and achievements etc.

10. DEVICE INFORMATION AND GEO-LOCATION

10.1. In order to fix crashes and other technical issues that may arise while you are installing the Games and using our Products, as well as to make our Products more suitable for you, we collect, store and use information about the device you are using the Products on, including what type of device it is, what hardware and operating system you are using, the device settings, unique device identifiers, and crash data (if any). Whether we collect some or all of this information often depends on what type of device you are using and its settings. You may also install

applications collecting and using additional data required for fixing crashes, errors and other technical issues arising during your use of the Products.

10.2. To make our Products more suitable for you and only upon your permission we can also collect your precise GPS location from mobile devices. Wi-Fi and IP addresses received from your browser or device may be used to determine approximate location.

11. INFORMATION REQUIRED FOR FRAUD AND VIOLATIONS DETECTION

11.1. We may also collect certain data (like IP address, username, etc.) that is required for our detection, investigation and prevention of cheating in the Game and [User Agreement violations](#). This data, being used only for the purposes of detection, investigation and prevention of frauds and cheating in the Game are deleted six months after their collection, unless the data can be used to prove that cheating has occurred. If the data can be used to prove that cheating or another fraud or User Agreement violation has occurred, we will further store the data for the establishment, exercise or defence of legal claims during the applicable statute of limitations.

12. INFORMATION FROM PUBLICLY AVAILABLE ONLINE RESOURCES

12.1. We may use the information made publicly available, e.g. through YouTube, Facebook, Instagram and Twitter, in order to find out your opinion about Game and Products, so that we could take them into account while improving our Products.

13. INFORMATION FROM OUR PARTNERS

13.1. In some cases, RP Grand receives your personal data as a data processor, which means that the data are controlled by our partners and we use them only in accordance with their instructions and applicable laws. We use this data in order to fulfil our obligation under the User Agreement, improve the Products, and when processing is required in order to comply with a legal obligation to which we are subject.

a) **Payment partners.** When you purchase in-game items, in-game currency, or time-limited premium memberships with your credit card, we may receive from our payment partners and process a part of your credit card number, information about your credit card issuer, as well as your full address for billing purposes;

b) **Co-Promotion Partners.** In order to provide you with in-game items and/or in-game currency for participation in various loyalty programs, we may also receive information from our partners, such as telecommunication companies, banks, cashback partners, travel agencies, and others;

c) **Platforms** We also receive and use your identifiers and other information on other platforms like PlayStation®5 computer entertainment system, Xbox One, App Store, Google Play Store, Steam, so that you can play our Games through these platforms;

d) **Social networks.** We have registered certain Games-related group accounts and pages at Facebook, YouTube, Instagram, Discord, Twitter, Reddit, and other social networks to better communicate with our players in case they have questions about our Products, as well as prefer to learn about news about our Products through the social networks.

e) We also automatically collect information via our Games application technologies that are not browser-based like cookies and cannot be controlled by browser settings or while you play in our Game. For example, our Games applications may include SDKs, which is code that sends information about your use to a server, for instance through the Facebook SDK or other partner's SDKs. These SDKs allows us to track our conversions, bring you advertising, and provide you with additional functionality, such as the ability to connect our Products with other services.

14. HOW WE USE YOUR INFORMATION

14.1. We need to process your Personal Data in order to perform the contract with you. As a user, we will use your Personal Data, unless otherwise prohibited by law, for the following purposes:

a) to provide you with the Products you request, i.e., to allow your installation of the Games, operate the Products and verify and confirm your payments;

b) to communicate with you about your Account or transactions with us and send you information about features on our Sites or changes to our policies;

c) to provide support including, but not limited to, product updates, product patches and fixes and other similar communications;

d) to arrange your travel, receipt of gifts and awards, to which you may be entitled as a result of winning an offline competition, etc.

15. COMMUNICATION PURPOSES

15.1. We will use your Personal Data for our legitimate interests to advertise our Products in accordance with this Policy. Namely, once you have created an Account we may use your email address, nickname, IP address, mobile phone number, in order to send you personalized marketing emails, messages, targeted in-game and web offers about Games. Also, if you opt-in, we will send you personalized marketing emails, messages and in-game and web offers about RP Grand offline events.

16. IN-GAME OFFERS

16.1. We will also use the Game-Related Information to send you in-game offers that we believe are most useful to you. To make the offer we first collect Game-Related Information from various players, identify patterns in their behaviour, and create algorithms that identify pools of players following the pattern or particular players who follow the pattern. To those players who actually follow the pattern – we send the in-game offers, which can be personalized (i.e., we want the in-game offer to reach you or a relatively small number of players specifically) or non-personalized (i.e., we want the in-game offer to reach a large number of players following a pattern). We always make sure that such offers have no significant impact on you or our other players. *For example, a player registered in the game a few months ago and still hasn't bought his own house, in that case we can give him some house for rent or donate it to him.*

17. HOW WE SHARE YOUR INFORMATION

17.1. For the performance of a contract with you, compliance with a legal obligation to which we are subject, and based on our legitimate interests, we may share your personal data with the following categories of third parties:

a) Payment partners: we share your email address, IP address, information about in-game purchases requested by you at RP Grand web-site, and other information you provide to us for the purpose of fulfilling your purchase and withdrawal requests;

b) Data storage partners: we store some of your information using third-party data storage services owned or operated by other entities, e.g., while some of your Game-related information is stored using Google Cloud Platform (BigQuery) etc.

c) Research partners: we may provide access to some of your data, such as your Game statistics, to provide marketing-related and other research. We share anonymous data with our partners unless your personal data is necessary for the requested services or research;

d) Player Support partners: for some territories and products we engage third parties to provide you with appropriate player support services. Such companies may get access to your personal data, including personal data that you may provide in your player support requests.;

e) Information available to other players: making your nickname and game statistics available to other players through our Products is an important part of making players' experience more enjoyable. If you are banned in a Game based on other players' complaints, we may inform them about the ban.

f) Public information: our Products may also have message boards, forums and/or chat areas, where users can exchange ideas and communicate with each other. When posting a message to a board, forum or chat area, please be aware that the information is being made publicly available on-line; therefore, you are doing so at your own risk and you are solely responsible for any information you make public. Your nickname and game statistics may also become available within Games replays and other videos, which RP Grand or other players may generate and put online. Please do not include into your nickname any data that can identify you personally.

g) Anti-cheat and anti-fraud companies: we may share the information required for our detection, investigation and prevention of cheating in the Games and User Agreement violations only for the purposes of detection, investigation and prevention of cheating in the Game.

h) Logistics partners: to arrange your trips (e.g., as an eSports player) and deliver the prizes you may be entitled to thanks to use of your Products, we can share your post address and other required details with our logistics partners or ask you to share that data with our logistics partners directly;

i) Public authorities and auditors: some personal data shall be disclosed to public authorities, e.g., tax and customs authorities, auditors, and other competent parties, in accordance with the laws of each local jurisdiction where we operate;

j) Security and compelled disclosure: We share information to comply with the law or other legal process (e.g., tax and customs authorities, auditors, and where required, in response to lawful requests by public authorities, including to meet security or law enforcement requirements). We also share information to protect the rights, property, life health, security and safety of us, the Products, or anyone else;

k) Competitions: Our competitions, contests, and tournaments (“Competitions”) may be jointly sponsored or offered by other parties. When you voluntarily enter a Competition, we share information as set out in the official rules that govern the Competition as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a Competition, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice and/or likeness in advertising or marketing materials.

17.2. Sharing anonymous information. We also may share anonymous information, i.e. information which does not directly or indirectly disclose your identity, and aggregated information (meaning information about groups and categories of users, including game statistics and behaviour, but which does not identify and that cannot reasonably be used to identify any individual user) with our advertising partners. We may also allow our advertisers to collect anonymous information and aggregated information within the Products and they may then share

that information with us. Our advertisers may collect this information through the use of tracking technologies like cookies and web beacons. This enables our advertisers to develop and deliver targeted advertising in the Products and on the websites of third parties, so that they can try to serve you with advertisements for products and services that are most likely to be of interest to you. Advertisers will also use this information to monitor, improve or modify their operations.

18. WE CAN CHANGE THIS POLICY

18.1. We may change this Policy from time to time for various reasons, such as legal and regulatory changes, changes in industry practices and technological developments that need to be reflected.

19. DISPUTE RESOLUTION

19.1. All disputes between the Parties to this Agreement shall be settled by correspondence and negotiation using the mandatory pre-trial (complaint) procedure. If the Parties cannot reach an agreement through negotiations within thirty (30) calendar days from the date of receipt by the other Party of a written claim, consideration of the dispute may be transferred by any interested Party to the court at the place of registration of RP Grand in accordance with the procedural and substantive law of the state of registration of RP Grand.

19.2. The substantive law of Poland and the European Union shall apply to the relations of the Parties on those matters not regulated or not fully regulated by the Treaty.