

Privacy Policy

Last revised: June 29, 2021

Stunlock Studios AB, 556808-8198 ("**Stunlock**" or "**we**" in any form) is committed to protect the personal data and safeguard the privacy of our website visitors, users of our games, and contact persons representing our customers, suppliers and other business partners. For more information about us, see Section 8.

This Privacy Policy describes how Stunlock, in its capacity as a data controller, processes personal data in accordance with the General Data Protection Regulation (EU Regulation 2016/679) (hereinafter referred to as the "**GDPR**").

1. Categories of personal data, processing purposes and legal bases

We generally collect personal data directly from you. Not providing your personal data may result in disadvantages for you, e.g. you may not be able to receive desirable information about us. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you. We may also collect personal data from third party sources.

1.1 Business partners (e.g. suppliers)

If you represent an organization that we do business with, we process personal data in order to facilitate our business relationship with the organization which you represent, i.e. first and last name, e-mail address, and correspondence between us and you.

Our legal basis for processing of the personal data is to our legitimate interest to conduct our business.

We will retain the personal data for as long as we have a business relationship.

1.2 Newsletters

We process personal data in the form of e-mail addresses of subscribers to our newsletters. Such personal data may be provided by the data subjects themselves when signing up to our newsletter on our website.

Our legal bases for processing personal data in this context is consent or legitimate interests. Where the legal basis is consent, this can be withdrawn at any time. You can also opt-out from future communication in each message.

We will retain the data until you delete your email from our database or withdraw your consent.

1.3 Communication and correspondence (e.g. in Discord)

Occasionally, we communicate or engage in correspondence with individuals in other matters than those accounted for above. This may be the case where individuals have general questions about our services. We processes personal data in order to answer you, e.g. Discord usernames and correspondence between us and you.

Our legal basis for processing personal data in this respect is contractual necessity, our legitimate interests to conduct our business to engage in general communication with existing and potential players and the general public, including to respond to such individuals.

We will retain the data until the support inquiry has been handled.

1.4 Handling Data Subject rights

We will process email address, name, correspondence and data associated with the request.

Our legal basis for processing personal data is compliance with a legal obligation.

The data will be retained as long as it may be relevant and for a maximum during the applicable statutory limitation period.

2. Retention

Your personal data will be retained as long as necessary to provide products, services or engaging in communication. In addition to retention for the foregoing purposes, we may also retain your personal data in order to comply with applicable laws, such as bookkeeping laws, or if we need your personal data to establish, exercise or defend legal claims.

3. Who do we share your personal data with?

Stunlock may engage external service providers, who act as data processors of Stunlock, to provide certain services to Stunlock, such as website service providers, marketing service providers or IT support service providers. When providing such services, the external service providers may have access to and/or may process your personal data. We request those external service providers to implement and apply security safeguards to ensure the privacy and security of your personal data.

In addition to the foregoing, Stunlock may transfer – in compliance with applicable data protection law – personal data to law enforcement agencies, governmental authorities, legal counsels, external consultants, or business partners. In case of a corporate merger or acquisition, personal data may be transferred to the third parties involved in the merger or acquisition, including potential buyers, investors and professional advisers.

4. International transfers of Personal Data

Personal data may be transferred to and processed by recipients which are located inside or outside the European Economic Area ("EEA"). The countries include those listed at the European Commission website which provide an adequate level of data protection from a European data protection law perspective. Other recipients might be located in other countries which do not adduce an adequate level of protection from a European data protection law perspective. Stunlock will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, we base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority, approved code of conducts together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient. You can ask for a copy of the such appropriate safeguards by contacting us as set out below in Section 8.

5. Data subjects' rights

You have a number of rights in connection with the processing of your personal data, subject to certain conditions set out in the GDPR and local data protection laws, including the right to:

- (i) Request access to your personal data ("data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (ii) Request the rectification of the personal data that we process about you. This enables you to have incomplete or inaccurate data we hold about you corrected.
- (iii) Request the deletion of your personal data. This enables you to ask us to delete or remove personal data where there is no overriding reason for us to retain it.
- (iv) Ask us to stop processing personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- (v) Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- (vi) Request the transfer of your personal data to another party.

If you have given your consent for processing of your personal data and that consent has served as a legal basis for processing, you can withdraw this consent at any time with future effect by contacting us as stated in the Contact us section below.

To exercise your rights please contact us as stated below in Section 8.

In case of complaints you may contact us as set out in Section 8 and you also have the right to lodge a complaint with the competent data protection supervisory authority in particular in the EU Member State of your habitual residence, place of work or of an alleged breach of the GDPR. In Sweden, this is Integritetsskyddsmyndigheten (www.imy.se).

6. Country specific provisions

#	Country	Input
1.	Canada	If you are located in Canada, please be advised that personal data may be transferred to and processed by recipients, and our service providers which are located outside of Canada. Such jurisdictions may not have the same level of data protection laws as those in Canada, and your information may be accessed by foreign law enforcement authorities in such jurisdictions in accordance with applicable law. However, Stunlock will take all necessary measures to ensure that transfers out of Canada are adequately protected as required by applicable data protection law.
2.	Russian Federation	Localization of user data The following apply when we collect personal data of Russian citizens: We record, systematize, accumulate, store, correct (update, alter), and

		<p>retrieve personal data of Russian citizens using databases located on the territory of the Russian Federation before uploading to our European servers.</p> <p>Cross-border transfer of data</p> <p>The following apply when the collecting, processing and use of your personal data is conducted within the territory of Russia and/or when we intentionally process personal data of persons located in Russia:</p> <p>When we transfer your data (including cookies) to the recipients located in countries that do not provide an adequate level of data protection from a Russian law perspective, we rely on contractual necessities (including respective Terms of Use or other contacts, which you are a party to).</p> <p>Children data</p> <p>The following apply when the collecting, processing and use of your personal data is conducted within the territory of Russia and/or when we intentionally process personal data of persons located in Russia:</p> <p>We do not knowingly collect personal data from children under 14 years old without parental or legal guardian consent.</p>
3.	Taiwan	<p>This Section applies where the collecting, processing and use of your personal data is conducted within the territory of the Republic of China (Taiwan).</p> <p>6.1 Consent</p> <p>By providing your personal data, you consent (for the purpose of Article 19 of Taiwan Personal Data Protection Act) to the collection, processing and use of your personal data in accordance with this Privacy Policy, as amended from time to time.</p> <p>6.2 Data subjects' right</p> <p>You have the following rights under Taiwan Personal Data Protection Act, including:</p> <ul style="list-style-type: none"> (i) Access: You have the right to make an inquiry of and to review your personal data. (ii) Copy: You have the right to request a copy of your personal data. (iii) Supplement and Correction: You have the right to require us to supplement or correct your personal data. (iv) Objection: You have the right to require us to stop collecting, processing or use of your personal data. (v) Erasure: You have the right to require us to erase your personal data.

		<p>If you wish to make the above request, please refer to our contact information under Section 9 of this Privacy Policy.</p>
4.	Turkey	<p>To the extent our processing of your personal data is subject to the Law No. 6698 on Protection of Personal Data of Turkey ("Turkish Data Protection Law"), the following terms apply to you and in the event of any conflict between the following additional terms and the provisions of the rest of the policy, the following terms shall prevail.</p> <p>We may rely on the following legal bases while processing your personal data in accordance with Article 5 of the Turkish Data Protection Law:</p> <ul style="list-style-type: none"> • processing of your personal data is necessary provided that it is directly related to the conclusion or fulfilment of the contract between us • processing is mandatory for us to be able to comply with our legal obligations • processing is mandatory for our legitimate interests, provided that it does not violate your fundamental rights and freedoms • your explicit consent (Please note that we rely on this legal basis only when we require your consent for the processing and we do not rely on this legal basis if and when we rely on one of the other legal grounds above) <p>If you are located in Turkey, according to Article 11 of the Turkish Data Protection Law, you have the following rights with respect to your personal data:</p> <ul style="list-style-type: none"> • the right to learn whether we process your personal data • the right to request information with regard to such processing, if we process your personal data • the right to learn the purposes of the processing and whether they are used for such purpose or not • the right to know the third parties within or outside the country, to whom we transfer your personal data • the right to request correction of incomplete or inaccurate personal data • the right to request deletion or destruction of your personal data under the conditions set forth in Article 7 of the Turkish Data Protection Law • the right to request that we notify the third parties, to whom we transferred your personal data, about the correction, deletion and/or destruction of your personal data per your request within the scope of the foregoing two items • the right to object to the negative results about you that are due to the analysis of your personal data processed solely by automated means • the right to claim indemnification for damages incurred due to illegal processing of your personal data <p>Please find below details of our data controller representative in Turkey:</p> <ul style="list-style-type: none"> • İlay Yılmaz, BM Istanbul ilay.yilmaz@bakermckenzie.com

5.	United Kingdom	<p>In relation to personal data of data subjects in the United Kingdom (“UK”) subject to the UK GDPR:</p> <ul style="list-style-type: none"> • references to the GDPR in this Privacy Policy shall be interpreted as meaning the GDPR as incorporated into the laws of the United Kingdom (“UK GDPR”) • personal data may be transferred to and processed by recipients which are located outside of the UK. Some recipients might be located in other countries which do not adduce an adequate level of protection from a UK data protection law perspective. Stunlock will take all necessary measures to ensure that transfers out of the UK are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, we base the transfer on appropriate safeguards, such as standard data protection clauses which provide appropriate safeguards for the purposes of the UK GDPR. You can ask for a copy of such appropriate safeguards by contacting us as set out below in Section 9; and <p>Local Representative in the UK:</p> <ul style="list-style-type: none"> • Benjamin Slinn, BM London Benjamin.slinn@bakermckenzie.com
6.	United States (California)	<p>California Privacy Rights. California law in some cases entitle California residents to ask us for a notice describing what categories of personal information Stunlock collects, from what sources, for what purpose and with whom Stunlock shares such information. California law also in some cases provide California residents with rights to request access to and deletion of certain personal information, to know whether personal information is shared, and to opt out of the “sale” of personal information. For information on how Stunlock processes personal data in the context of providing our games, to understand how we honor these California rights and to make requests regarding these rights if they apply, please visit our <u>California Privacy Notice and Policy</u>.</p>

7.	Brazil	<p>Users residing in Brazil, under certain circumstances and subject to the restrictions set forth by applicable law, including law # 13709/18 ("LGPD"), You have the following rights in connection with your personal data:</p> <ul style="list-style-type: none"> • confirm the existence of processing of your personal data that Stunlock lawfully makes; • access your personal data, and request a full simplified or full report about the personal data that Stunlock is lawfully processing about you; • request correction of any incomplete, outdated or inaccurate personal data Stunlock holds about you, although Stunlock may need to verify the accuracy of the new data you provide to us; • request anonymization, blocking or deletion of unnecessary or excessive data, or data processed in non-compliance with the applicable law; • revoke your consent at any time, where Stunlock relies on your consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent; • request deletion of your lawfully processed personal data that was processed based on your consent; • request information about public and private entities with which Stunlock has shared your personal data; • request data portability or the transfer of your personal data, in certain circumstances, pursuant to applicable laws. <p>If you wish to exercise these rights, you may contact Stunlock by e-mail at dataprotection@stunlockstudios.com.</p> <p>You may also contact Stunlock at any time if you have queries, as indicated below, and you also have a right to lodge a complaint with the applicable supervisory authority.</p> <p>If you have a concern about how Stunlock collects and use information, please contact Stunlock Data Protection Officer Ruth Dominguez at dataprotection@stunlockstudios.com.</p> <p>International Data Transfers</p> <p>You are aware and understand that Stunlock may transfer or disclose personal</p>
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		<p>data that Stunlock collects about you to recipients in countries other than Brazil. These countries may not have the same data protection laws as Brazil. When Stunlock transfers or discloses your personal data to other countries, Stunlock will protect that information as described in this Privacy Policy and Stunlock will take steps to ensure that your personal data is adequately protected as required by applicable data protection laws.</p> <p>Children data</p> <p>Stunlock does not knowingly collect any personal data from individuals located in Brazil under the age of 12 (incomplete) without parent or legal guardian consent.</p>
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[California Privacy Rights. California law in some cases entitle California residents to ask us for a notice describing what categories of personal information Stunlock collects, from what sources, for what purpose and with whom Stunlock shares such information. California law also in some cases provide California residents with rights to request access to and deletion of certain personal information, to know whether personal information is shared, and to opt out of the “sale” of personal information. To understand how we honor these California rights, to make requests regarding these rights if they apply, please visit our **California Privacy Notice and Policy.**]

7. Cookies and other tracking technologies

This website uses cookies. For further information please visit our [Cookie Policy](#).

8. Changes to the Privacy Policy

Stunlock reserves the right to change this Privacy Policy at any time. We will give you reasonable notice of any changes to the Privacy Policy, where appropriate. If so, we will notify you by a message or by email. You will also find the date of the latest change to the Privacy Policy on this website.

9. Contact information

This website is owned and operated by the company Stunlock Studios AB.

We are registered in Sweden under corporate registration number 556808-8198, and our address is Box 133, 541 23 Skövde.

If you have concerns or questions regarding this Privacy Policy, please contact us on dataprotection@stunlockstudios.com.