

PRIVACY POLICY

- This Privacy Policy explains how your personal data is collected and processed by GamesTurf Studio (“GamesTurf”) when you use the our mobile application (the “App”).
- The App is a free to play game (with optional in-game-purchases), and in order to maintain the high quality and a great game experience we process information from and about you in particular to improve the entire experience in the App and to support internal operations.
- We update the Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, depending on the specific changes, we will provide you with additional notice or require a renewed consent. We encourage you to review the Privacy Policy whenever you access the App to stay informed about how we process your personal data and how you can protect your privacy

COLLECTION OF INFORMATION

Information we collect automatically through the app

- When you access or use the App, we automatically collect general information about you, including:
 - Age: we log your age as indicated by you in the age gate upon downloading the App.
 - Log Information: We log information about your use of the App, including the type of device you use, the features you use, access times and your IP address.
 - Device Information: We collect information about the device you use to access the App, including information about the device's software and hardware, unique device identifiers (i.e. Device ID and advertising ID), device tokens for push-messages, mobile network information and time zone.
 - Usage Information: We collect information relating to your use of the App, including you
 - Consumption information: We collect information about your consumption habits relating to your use of the App, including which purchases you make with both virtual and real currencies and the reception of virtual goods in-game.

Information we collect from other sources

- If you log into the App using a third party site or platform such as Facebook, Apple Game, Center and Google Sign-In, we access information about you from that site or platform, such as your screen name, profile information and friend lists, in accordance with the authorisation procedures determined by such third party site or platform provided that you have given the third party site in question such consent.
- If you log into the App using a third party site or platform, you represent and warrant that
 - (i) your access and use of such features in connection with the App will comply with the applicable terms and policies of such site or platform; and (ii) that you are over

the minimum age limit that is prescribed for such third party site or platform by the legislation in the individual jurisdictions.

Use of information – purpose and legal basis

- We use information about you for the following purposes in accordance with the legal bases for each type of personal data as described below:

Age

- is being processed:
 - to identify whether you are a child or adult for data protection purposes to determine the legal requirements for our processing of your data.;
 - Our processing for the above purpose is necessary for compliance purposes, see Article 6(1)(c) of the GDPR. 1
 - to monitor and analyze trends, usage and activities in connection with the App.
 - Our processing for the above purposes is justified by our legitimate interests in providing content of interest to you and improving our services in accordance with Article 6(1)(f) of the GDPR (also known as "the balancing-of-interest rule").

Log-, device-, usage-, and consumption information

- are being processed:
 - to provide and deliver the products and services you request and send you related information as requested by you / as agreed with you;
 - to provide and maintain the App and the game experience; and
 - to send you technical notices, updates, security alerts, and support and administrative messages; Our processing for the above purposes is necessary for the performance of a contract to which you are party in order to support the operation of the App, facilitate the delivery of requested products and services and enable maintenance and update of the App, see Article 6(1)(b) of the GDPR.

- to provide news and information about the App that we think will be of interest to you;
- to personalize and improve the App and provide tailored content and features;
- to monitor and analyze trends, usage and activities in connection with the App; and
- to provide children (as this term is construed under GDPR in EU, COPPA in the US and relevant applicable legislation in other jurisdictions) with reasonable contextual advertisements in the App. Our processing for the above purposes is justified by our legitimate interests in providing advertisements and content of interest to you and improving our services in accordance with Article 6(1)(f) of the GDPR (also known as "the balancing of-interest rule").
- to provide non-child users that have given us consent to share their advertising IDs with our ad network partners (as further specified under Sharing of Information) for the purpose of serving them with personalized advertisement in the App (behavioral advertising). Our processing for the above purpose is justified by our legitimate interests in providing advertisements and content of interest to you in accordance with Article 6(1)(f) of the GDPR. The disclosure of your advertising ID to third parties for the purposes of behavioral advertising is based on your consent in accordance with Article 6(1)(a) of the GDPR (see more below under Sharing of Information).

Information from other sources

- are being processed:
 - to provide and deliver the products and services you request and send you related information;
- Our processing for the above purpose is necessary for the performance of a contract to which you are party in order to facilitate the delivery of requested products and services, see Section 6(1)(b) of the GDPR.
 - to link or combine information we get from others to help understand your needs and provide you with better service; and m. to provide news and information about the App we think will be of interest to you;

- Our processing for the above purposes is justified by our legitimate interests in providing content of interest to you and improving our services in accordance with Article 6(1)(f) of the GDPR.
- We only process your information to the extent that is necessary to achieve the purposes for which the information has been collected.

Storage of information

- GamesTurf will store your personal data for as long as necessary in order to provide you with the App or otherwise fulfil the purposes as described above, unless further storage is required in order to establish, exercise or defend a legal claim or to comply with applicable law, including accounting rules.
- Your personal data are deleted or anonymized as soon as it no longer serves one of the above mentioned purposes and in any event no later than three (3) years after your interaction with GamesTurf has ceased.

Sharing of information

- We disclose information about you to the following categories of recipients based on the legal bases in Sections 6(1)(b), 6(1)(c) and 6(1)(f) of the GDPR (see a description of the legal bases above):
 - Social networks, see more under "Social Sharing features";
 - Third parties if we are required to disclose your personal data by applicable law, rule, regulation, legal process or in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
 - The authorities if we believe your actions are inconsistent with the spirit or language of our policies or if the disclosure is necessary to protect the rights, property and safety of GamesTurf or others;

- Other players in order to provide certain in-app features, such as leaderboards, if you log into the App using a third party service, such as Facebook or Apple Game Center;
- Advertising network companies in order to serve contextual advertisements (the data include your IP-address, Device ID and advertising ID).
- Furthermore, if you have given your consent in accordance with Section 6(1)(a) of the GDPR, we share your advertising ID to advertising network companies for the purpose of them serving behavioral advertisements to you within the App. We use or may use the following advertising network companies:
 - Adcolony <https://www.adcolony.com/privacy-policy/>
 - Chartboost <https://answers.chartboost.com/hc/en-us/articles/200780269>
 - Facebook Ads <https://www.facebook.com/about/privacy/>
 - Flurry
<https://policies.yahoo.com/us/en/yahoo/privacy/products/developer/index.htm>
 - InMobi <http://inmobi.com/privacy-policy/>
 - Supersonic/IronSource <https://www.ironsrc.com/privacy-policy/>
 - Tapjoy <https://home.tapjoy.com/legal/#privacy-policy>
 - Vungle <https://vungle.com/privacy/>
 - Mobvista <https://www.mobvista.com/en/privacy/>
 - Yeahmobi <https://www.yeahmobi.com/privacy-policy/>
 - SuperAwesome <https://www.superawesome.com/awesomeads-privacy-policy/>
 - Adverty <https://www.adverty.com/privacy-policy/>
- The recipients' use of the disclosed information will not be covered by this Privacy Policy. If you have questions concerning the processing carried out by such third parties, you should review their privacy policy.
- In connection with our processing, we use data processors such as server hosting providers, technical service providers for supporting internal operations, user login services and analytics service providers.

Social sharing features

- The App offers social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take in the App with other media. You must be over the minimum age limit that is prescribed by the legislation in the individual jurisdictions to use any social sharing features integrated in the App. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature.
- The App has social features from the following providers:
 - Facebook
 - Game Center
 - For more information about the processing carried out by the respective third parties in connection with social sharing features, please visit the privacy policies of the entities that provide these features, which can be found here:
 - Facebook: <https://www.facebook.com/about/privacy/>
 - Game Center

Children

- The App is for a general audience. In order to comply with the legislation, you will be presented to an age screen, when launching the App. When presented with this age screen, it is important that you state the correct age.
- Based on your age information and your device settings, Gamesturf does not process personal data of children under the minimum age limit that is prescribed by the legislation in the individual jurisdictions for behavioral advertisement. If such personal data have been processed without Gamesturf's knowledge, Gamesturf will, after having become aware of the incident, immediately take reasonable measures to stop such processing and promptly delete any such data from Gamesturf's records.

- If you have additional questions about Gamesturf's privacy practices related to children under the applicable minimum age, please contact us at gamesturfstudio@gmail.com

Transfer to third countries

- In connection with the processing, we will in certain circumstances transfer your personal data to recipients in the U.S which has been declared an unsafe third country by the European Commission.
- We only transfer personal data to entities in third countries that have provided appropriate safeguards to ensure that their level of data protection is in agreement with this privacy policy and applicable law.
- Consequently, the transfers will only occur based on the following safeguards:
 - If the entity is certified to comply with the principles for data protection under the US-EU Privacy Shield Framework ("Privacy Shield") (you can view the entities certified under Privacy Shield at www.privacyshield.gov), or
 - If we have entered into standard data protection clauses adopted by the Commission with the entity, which is deemed to offer sufficient safeguards with respect
 - to the protection of the privacy and fundamental rights and freedoms of individuals (you can obtain a copy of the clauses by contacting Gamesturf).

The right to data portability:

- You have the right to receive the personal data you have provided us with which we process in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller if the processing is based on consent or contract performance, see Article 20 of the GDPR.

Push notifications

- We send push notifications or alerts to your mobile device to provide game-related information, service updates, promotional communications and other related messages, if you have agreed to such notifications. You can deactivate these notifications by changing your notification settings on your device.

Contact and complaints

- Gamesturf has the following contact information:
 - GamesTurf
 - E-mail: gamesturfstudio@gmail.com
- If you wish to remove processing your personal data write us email to gamesturfstudio@gmail.com with Subject “ Remove My Personal Data”

NOTE:

- If you install the application it's untestable that you agreed to share your personal information and processing it for.