



Privacy Policy

Welcome to the Dzelo Game APP. This policy applies to you and Mark Repac the Developer of the App, irrespective of your country of residence or location.

This Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum to make sure you understand the information we collect, why we collect it, how it is used and your choices regarding your information.

This Privacy Policy applies from 20 July 2021.

The Data Controller

The person that is responsible for your information under this Privacy Policy (the “data controller”) is:

Mark Repac

simple.pixel.contact@gmail.com

Where This Privacy Policy Applies

This Privacy Policy applies to the Dzelo Game APP. For simplicity, we refer to all of these as our “services” in this Privacy Policy.

Information We Collect

To help you enjoying the Dzelo Game APP, we collect some basic as you use our services, for example access logs, as well as information from third parties. If you want additional info, we go into more detail below.

However, we do not directly collect personal data when you are using our services. In this sense, we will not ask you to provide any personal information when you are using our app.

If you contact us the data you provide will be stored so that your message can be forwarded to the correct contact person. This is done in accordance with Article 6 lit. f) GDPR to process your request. Your data provided will not be used for any other purposes, in particular not for advertising.

Usage Information

We collect information about your activity on our services, for instance how you use them (e.g., date and time and access, features you’ve been using, webpage address, advertising that you click on) and how you interact with our services .

Device information

We collect information from and about the device(s) you use to access our services, including:

- hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google’s AAID and Apple’s IDFA, both of which are randomly generated numbers that you can reset by going into your device’ settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
- information on your wireless and mobile network connection, like your service provider and signal strength; information on device sensors such as accelerometers, gyroscopes and compasses.

Children Data

Children need particular protection when collecting and processing their personal data because they may be less aware of the risks involved. Compliance with the data protection principles and in particular fairness is central to all our processing of children’s personal data. Where we process a child’s personal data consent from whoever



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holds parental responsibility for the child is obtained. Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased.

Unity

Our app is built using the game development platform Unity (operated by Unity Technologies, 30 3rd Street, San Francisco, CA 94103, United States). This uses software modules and libraries that come from Unity Technologies itself or third parties and become an inherent part of our Apps (called a game engine). During the execution of the app, personal data may be processed by Unity itself, including device identification numbers (so-called UDID - unique device identifiers, IP address). Data such as the device type, country of app installation, advertising ID, sensor markings (e.g. from the pressure or acceleration sensor), game identification number (app ID) and the checksum of the transmitted data are also processed.

Using Unity also means that the services are using "Unity Analytics" and "Unity Ads". Unity Analytics and Unity Ads collect the personal data such as IP addresses and device identification number (so-called UDID - unique device identifiers). Other data collected includes device specifications (device type, device language), usage data, information about in-app behaviour and in-app purchases, custom event data (where applicable). Through Unity Analytics and Unity Ads, we can find out which app ads are tapped or clicked on from your device, which of advertisement was watched and whether you download and use the advertised apps.

We do not have access to individual IP addresses or device numbers. You can find more information about Unity Technologies' privacy policy here: <https://unity3d.com/en/legal/privacy-policy>

How We Use Information

The main reason we use your information is to deliver and improve our services. Additionally, we use this info to help keep you safe and to provide you with advertising that may be of interest to you. Read on for a more detailed explanation of the various reasons we use your information, together with practical examples.

- To provide our services to you;
- To create and manage our App and provide new features.
- To improve our services and develop new ones
- To conduct research and analysis of users' behaviour to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behaviour)
- To prevent, detect and fight fraud or other illegal or unauthorized activities
- To Address ongoing or alleged misbehaviour
- To Perform data analysis to better understand and design countermeasures against these activities
- To ensure legal compliance
- To Assist law enforcement
- To Enforce or exercise our rights.

To process your information as described above, we rely on the following legal bases:

Provide our service to you

Most of the time, the reason we process your information is to perform the contract that you have with us. For instance, as you go about using our service.

Legitimate interests

We may use your information where we have legitimate interests to do so. For instance, we analyse users' behaviour on our services to continuously improve our offerings, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.



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Consent

From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

How We Share Information

We use third parties to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, analytics and security operations.

We may also share information with partners who distribute and assist us in advertising our services. For instance, we may share limited information on you in hashed, non-human readable form to advertising partners.

We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

Push notifications

The app can notify you of certain news via push notifications, even if you are not actively using the app at the time. The app only uses these push notifications if you have explicitly activated them. The legal basis is Article 6, paragraph 1(a) of the GDPR.

When you activate the push notification service, a so-called device token from Apple or a so-called registration ID from Google is assigned to your device. The sole purpose of their use by us is to provide the push services. Without a device token or registration ID, no push messages can be sent to you for technical reasons. These identifiers are only encrypted, randomly generated numbers.

Notes for Apple users:

In order to be notified of certain events and topics via push notifications, even if you are not currently using the app, you must grant the app the necessary permission. Without your consent, which you give by activating it in the settings, we cannot send you a push message. The first time you log in to the app, you will be asked if you want to allow push notifications. You can then adjust the permissions for push notifications in the iOS settings and turn push notifications on or off at any time later.

To do this, open the "Settings" app of iOS and select the menu item "Messages". In the following menu you will find an overview of all apps that are installed on your device and that have a push notification function. Select our app here. Here you can switch the push notification function on or off. You also have the option of customising the display of push notifications in the app according to your preferences.

Notes for Android users:

On Android, all apps are set by default so that you can receive push notifications even if you do not have



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the app open. Unfortunately, this cannot be avoided due to Google's technical specifications, over which we have no influence. The app will not use this permission without your permission. You will only receive push notifications if you explicitly activate this function in the app.

Within the app, you can deactivate the push services you have activated at any time. Independently of the settings in the app, you can also switch off the receipt of push notifications by calling up the app "Settings" in the main menu of your device and selecting the item "Apps" in the following menu item. There you will find an overview of all apps installed on your device. Select our app here. You can then switch the push notification function on or off by ticking "Show notifications".

Evaluation of user behaviour (app tracking)

Firestore

This app uses "Firestore Services" (Firestore), an analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Firestore enables us to analyse the usage behaviour of the users of this app. The insights gained from this help us to improve this app and thus make your user experience more pleasant. Firestore is a real-time database that we use for real-time data exchange and storage. This involves the transfer of user data to Firestore.

Some Firestore services process personal data. In most cases, the personal data is limited to so-called "instance IDs", which are provided with a time stamp. These "Instance IDs" assigned by Firestore are unique and thus allow linking of different events or processes. We process this aggregated data to analyse and optimise usage behaviour, such as by evaluating crash reports. The legal basis for the processing is Article 6, paragraph 1(b) of the GDPR, which states that the data is necessary for the performance of our service.

For Firestore Analytics, Google also uses the advertising ID of the mobile device in addition to the "instance ID" described above. You can restrict the use of the advertising ID in the device settings of your mobile device.

For Android: Settings > Google > Ads > Reset Ad ID

For iOS: Settings > Privacy > Advertising > No Ad Tracking

Firestore Cloud Messaging is used to be able to send push messages or so-called in-app messages (messages that are only displayed within the respective app). A pseudonymised push reference is assigned to the end device, which serves as the target for the push messages or in-app messages. You can find more information in the above section "Push messages".

The data generated in this context may be transferred by Google to a server in the USA for analysis and stored there. Furthermore, we have concluded several supplementary agreements on data processing with Google.

You can find more information on data protection at Google and Firestore at <https://www.google.com/policies/privacy/> and <https://firebase.google.com/support/privacy/>.

With your consent or at your request

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioural data, geolocation in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances. We may also share this information with third parties (notably advertisers) to develop and deliver targeted advertising on our services and on websites or applications of third parties, and to analyse and report



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on advertising you see. We may combine this information with additional non-personal information or personal information in hashed, non-human readable form collected from other sources.

Advertising

Advertisers and third parties also may collect information about your activity on our sites and applications, on devices associated with you, and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our sites and applications and on third-party sites and applications. You can opt out on the [Digital Advertising Alliance \(DAA\)](#) if you wish not to receive targeted advertising. You may also be able to choose to control targeted advertising on other websites and platforms that you visit. In addition, you may also choose to control targeted advertising you receive within applications by using the settings and controls on your devices.

Your Rights

We want you to be in control of your information, so we have provided you with the following:

Information, deletion and correction

Within the framework of the applicable legal provisions, you have the right at any time to free information about your stored personal data, its origin and recipient and the purpose of data processing and, if necessary, a right to correction or deletion of this data. For this purpose, as well as for further questions on the subject of personal data, you can contact us at any time.

Right to restriction of processing

You have the right to request the restriction of the processing of your personal data. For this purpose, you can contact us at any time. The right to restriction of processing exists in the following cases:

If you dispute the accuracy of your personal data stored by us, we usually need time to verify this. For the duration of the review, you have the right to request the restriction of the processing of your personal data. If the processing of your personal data happened/is happening unlawfully, you can request the restriction of data processing instead of deletion.

If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request restriction of the processing of your personal data instead of erasure.

Updating your information

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us at.

For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact us to provide their written consent before the information is released.

Also, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you any more. For instance, we cannot provide our service if we do not have your date of birth.

Uninstall



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You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.

Accountability

In certain countries, including in the European Union, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process information. The data protection authority you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

How We Protect Your Information

We work hard to protect you from unauthorized access to or alteration, disclosure or destruction of information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure.

We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security.

How Long We Retain Your Information

We keep your personal information only as long as we need it for legitimate business purposes and as permitted by applicable law. To protect the safety and security of our users on and off our services, we implement a safety retention window of three months following account deletion. During this period, account information will be retained although the account will of course not be visible on the services anymore.

In practice, we delete or anonymize your information upon deletion of your account (following the safety retention window) or after two years of continuous inactivity, unless:

- we must keep it to comply with applicable law (for instance, some “traffic data” is kept for one year to comply with statutory data retention obligations);
- we must keep it to evidence our compliance with applicable law (for instance, records of consents, Privacy Policy and other similar consents are kept for five years);
- there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
- the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users’ safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behaviour or security incidents from opening a new account.
- Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

Changes

Because we’re always looking for new and innovative ways to help you build meaningful connections, this policy may change over time. We will notify you before any material changes take effect so that you have time to review the changes.



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How To Contact Us

If you have questions about this Privacy Policy, please contact us using the details provided.