

INTRODUCTION

Swagtorious. acting both as joint controllers (please see JOINT CONTROLLERS below for more details) and their subsidiaries and parent companies (collectively, “Swagtorious”, “we”, “our,” or “us”) are a social gaming companies that develop, produce and distribute products and services for its players worldwide.

This is our privacy policy (the “Privacy Policy”), which explains how we collect, use and share data through our mobile applications (the “Applications”), our websites (the “Websites”), our pages or presence on third party websites (e.g., Facebook) (the “Third Party Platforms”) and other platforms, websites products, offers and services that we offer from time to time, all of which together we refer as “Services” or “Service”.

This Privacy Policy applies when you use our Services. Please read it before using our Services.

“Swagtorious” in this Privacy Policy refers to Swagtorious, Swagtorious. and any other corporate entities within the same corporate group (including parent companies and subsidiaries) (“Affiliated Entities”).

If you do not want Swagtorious to collect, store, use, or share your personal information in the ways described in this Privacy Policy, you may not play our games or use our Services.

Our Privacy Policy applies whenever you use our “Services” which, as we described above, means our games, products, services, content, our websites, for example at www.Swagtoriousgames.com and www.Swagtoriouscasino.com, and/or other domains or websites operated by Swagtorious and our social media accounts and pages. It describes the ways we use your (personal) data and your rights.

Regardless of whether you are located in or outside of the European Union or European Economic Area, Swagtorious and Swagtorious. are the “joint data controllers” of your personal data – if you want to know more about Swagtorious and Swagtorious. as the joint data controllers please click here or scroll down. We will refer to countries in the European Union (EU) and the European Economic Area (EEA) and Switzerland collectively as the “European Countries” in our Privacy Policy.

DATA COLLECTION

We will collect and store any data that you provide to us, including when you create your account or a player profile while using our games in the Applications.

1 Data about you that you give us directly

While you use our games, you may give us data directly (like when you are setting up your account), and we will store that data on our databases and use it for the purposes described in this Privacy Policy.

When you use our games you may give us the data like:

first and last name

nickname

gender

age

e-mail address; or

other information that helps us make sure it is you accessing your account or helps us improve our Services

You may also create a player profile in our game which other players can see and which may include the data like:

profile photo (for example while connecting by Facebook)

first and last name

nickname

gender

age

physical location data that you provide

player ID that is created by us and used to identify your game account.

2 Information about your contacts

When you connect to our game by Facebook, we may also collect information that you provide to us about your Facebook Friends' List, but be sure to ask their permission first.

3 Data generated using our games

When you use our games, we collect data about the ways in which you use and interact with our games, such as when and for how long you play, game features and other players you interact with, purchases you make, progress or levels you achieve, and other gameplay activities. We also collect crash data such as crash logs to diagnose issues in our games. If you choose to use communication features in Services that allow you to communicate or share information with other players, then we would collect information on what is communicated or shared. This may include your in-game actions like:

participation in player clubs

public posts or comments on other players' profiles

non-public messages or invitations to other players

chats with other players

events in our games.

We may access in real-time, record, and/or store archives of these communications, comments, and other user-generated content on our servers to make use of them to protect the safety of our players; to protect our rights and property in connection with our Services; to conduct research; to operate, improve, personalize, and optimize our Services and our players' experiences, including through the use of analytics; and to manage and deliver (tailored) advertising. Where required by law, we will seek your consent for this.

4 Payment data

We also collect data related to any purchases you make.

If you purchase in-game virtual currency, our third-party payment partners will collect the billing and financial information it needs to process your charges. This may include your postal address, e-mail address, and financial data. Our payment partners do not share your financial information, like credit card numbers, with us, but they may share non-financial data with us related to your purchases, like your name, and the items purchased.

When you play our games connected third-party applications or platforms (like Facebook, Apple or Google), any purchases you make will be processed by that third-party application and subject to that third-party application's terms of service and privacy policy. For these purchases, Swagtorious does not receive your financial data, but may receive non-financial information related to your purchases, like

your name and the items purchased. The information Swagtorious receives depends on our game you are playing and the third-party application. Our Terms of Use explain our policies and terms related to charges, billing, third-party credits, and virtual currencies. Please note that purchases of third-party credits or currencies are also subject to those parties' terms of service and privacy policies.

5 Support correspondence

When you ask for help from our support team, we may collect and store the contact information you give them (generally, your name, e-mail address, player ID), data about your game play or your activity in a game. We will also store the communications you have with our support and any additional information in those communications in order to provide support and improve the Services. Please note that in many cases in order to identify you we will need a minimum amount of data (e.g., player ID). Without this information, we will not be able to provide support or answer to your data rights' requests (as mentioned in Section 5 below), so please be aware that we may contact you and request additional information in order to provide service.

We work with processors based in the United States as well as other countries, which provide an online helpdesk and in-app support systems. When you contact us for support, the below information will be handled by our processors strictly in accordance with our instructions:

game you are playing

name or nickname

e-mail address

platform you are playing on

problem description

language

player ID or

Facebook ID.

Our processors also automatically collect additional types of data, such as your IP address and data sent by your device to provide and improve their service. The data is then transferred to a processors' servers in the United States. As a safeguard to protect your privacy, we arranged a data processing agreement with our support partners or joint sharing personal data agreements (where our partner is also a data controller of the personal data), where we ensure that your personal information is only used in accordance with our instructions and not for their own purposes or are used in accordance with the applicable law requirements or our contractual arrangements with our partners. In addition, your

request is submitted via an encrypted connection and we apply the principle of data minimization to collect only such data that is actually required to best answer your support request. The content of your request will be stored as long as you are an active player of our game, so you can get a faster response in case you have a similar problem in the future. The purpose of using the service support partners is to answer the extensive number of user requests we receive. Our support processors help us to improve our customer service so that you can get a faster and helpful response.

6 Data about you from third-party partners

We collect some information from other entities, including social networks like Facebook, if you access our games through your accounts with those entities or you choose to connect your accounts with those companies to our games.

If you play our games through any third-party applications, including Facebook, Swagtorious may receive certain data about you from the provider of the third-party application. The information we receive depends on our game you are playing, the third-party application, your privacy settings, and, if applicable, your friends' privacy settings on that third-party application. For instance, we may collect and store some or all of the following information from the provider of the connected third-party application:

first and last name

profile picture

your user ID (Facebook ID), which may be linked to publicly-available information (public profile) like your name and profile photo

your friends' list and other public data

e-mail address you provided to that third-party application

physical location and that of the devices you use to access our Services

gender

age

information about your activities on or through the connected third-party application

other publicly-available data on the third-party application; and/or

any other information that you or the provider of the third-party application share with us.

If you access our Services from a third-party application or connect our Services to a third-party application, you should also read that third-party application's terms of use and their privacy policy.

7 Cookies

We collect information about your device and how you use our games, including using cookies.

As further described in our Cookies Policy, we use cookies to recognize you and/or your device(s) on, off, and across different Services and devices. We also allow others to use cookies and similar technologies as described in our Cookies Policy. You can control or opt out of the use of cookies and similar technologies that track your behavior on the sites of others for third-party advertising, as described in our Cookies Policy.

We, our service providers, and our partners use cookies and other similar technologies to collect and analyze certain kinds of technical data, including:

IP address

type of computer or mobile device you are using

platform type (like Apple iOS or Android)

operating system version

mobile device's identifiers, like your MAC Address, Apple Identifier For Advertising (IDFA), Android Advertising ID (AAID), and/or Google Advertising ID (GAID)

browser type and language

number of clicks on an app feature or web page

amount of time spent on an app feature or web page

pages viewed and the order of those pages; and/or

game state and the date and time of activity on our game

If you play our games on a mobile device, in addition to your device identifiers (described above), we may also collect:

name you have associated with your device

country

telephone number (if you provide it)

specific geolocation (with your permission)

mobile contacts (with your permission, as described below).

8 Other

We may store personal data recorded in system logs (a program used to store a chronological record containing information about events and activities related to the IT system used to provide services by us) when visiting any of our websites. Our server collects this information automatically.

We may collect data from other third-party sources. Where we do, we let you know.

We may collect or receive data about you from other sources like third-party data providers. We use this data along with information you provide us directly, for example, to help you and your friends connect or to serve you advertising more tailored to your interests.

USE OF DATA AND LEGAL GROUNDS FOR PROCESSING

We use your data to provide, personalize, maintain the security of, and improve the games you use; to maintain our business operations; and to exercise, defend or establish our rights.

We use your data under several legal grounds, including:

to perform our contract with you

for our legitimate business interests

to comply with our legal obligations

your consent.

The use of data we collect and store is to provide you with the Services you request from us and to improve your in-game experience, but there are other uses as well. The uses for which we collect and store your data include:

to improve and optimize our games and your experiences in our games

to create your player accounts and allow you to play our games

to identify and suggest connections with other players and personalize our Services to you

to communicate with you, including in-game updates and notifications, new Services, and promotional offers that we think might be of interest to you

to enable players to communicate with each other

to provide support and respond to player requests

to protect the safety

to protect our rights and property in connection with our games

to prevent fraud or potentially illegal activities, and to enforce our Terms of Use

to manage and deliver customized advertising

to administer promotional activities or events sponsored or managed by us or our partners

to comply with our legal obligations, resolve any disputes we may have with you or other players, and to enforce our agreements with third parties,

to ensure the security of the IT system and managing this system.

If you are located in the European Countries, our legal basis for collecting and using the data described above depends on what data is and the context in which we collect it.

However, we normally collect data from you only where we need it to perform our contract with you (i.e., our Terms of Use), where the processing is in our legitimate interests (provided that these aren't overridden by your interests or rights), or if you give us your consent.

In some cases, we may also have a legal obligation or need to collect data from you or may otherwise need the personal data to protect your vital interests or those of another person (for example, another player). If we ask you to provide data to comply with a legal requirement or to perform a contract with you, this will normally be clear from the context in which we are asking you to provide your data (for example, when we ask you to provide a username to access our Services, this will be to create an account for you in accordance with our Terms of Use), and, if not, we will provide an explanation to you at the relevant time. We will also make clear whether providing data is mandatory.

Similarly, if we collect and use your data in reliance on our legitimate interests (or those of any third party), it will be made clear to you at the relevant time what those legitimate interests are (such as personalizing our services and direct marketing, improving and optimizing our games and your experiences in our games, communicating with you, providing support and respond to player requests, protecting the safety, protecting our rights and property in connection with our games, preventing fraud or potentially illegal activities and enforcing our Terms of Use, administering promotional activities or events sponsored, resolving any disputes we may have with you or other players, enforcing our agreements with third parties, for example).

If you have questions or need further information about the legal bases on which we collect and use your personal information, please contact us at any time.

DATA SHARING

We share some of your data with your friends and other players that you are playing with to facilitate your in-game interactions. We may also share your data with third parties or allow third parties to collect this information from our games in the following manner:

1 Friends and other players

Our games support encourage you to interact with other players. In most games, if you play through a social network or connect to a social network (like Facebook), your friends who also play our game will see your name, photo, player profile and descriptions of your in-game activity.

Further, in our games other players (not being your friends) will be able to see your player profile; view descriptions of your in-game activity; communicate with you within our games and send you game requests or friend requests through our games.

2 Third-party advertising and analytics

We might share some of your data with advertisers.

We mainly use advertising to enable us to offer some of our games for free. These advertisements may include, without limitation, banner ads on in a game, as a full-screen ads between moves or games in which third-party advertisers offer to provide in-game items to players in exchange for watching an advertisement or for completing a task. Offers are hosted by third-party offer wall providers, and the offers are made by third-party advertisers or by us (in case of showing our advertisements).

Within this purpose, we process your personal data based on our legitimate interest, which is allowing our game to be offered for free, developing and working on your game experience for free, proposing you some new offers concerning our games. Also, upon your consent, we might use and share your personal data with our partners to tailor the ads to your interests. The list of such partners as well as their privacy policies can be found here. We might update it from time to time.

To enable advertisers and ad media partners to serve you with more relevant ads, they may collect, or we may collect and share with them, the following types of data when you use our games:

performance data (like the number of clicks on an advertisement)

certain technical information (like IP address, non-persistent device identifier such as IDFA, and de-identified persistent device identifier such as a hashed Android ID, Apple ID, Google ID) ; and/or

a unique identifier, such as your Facebook ID or your player ID

In addition to serving you with relevant ads, the data collected may be used to:

measure how effective ads are

offer you targeted advertising (both on and off our games) in order to personalize your experience by showing you advertisements for products and services that are more likely to appeal to you (a practice known as interest-based advertising or behavioral advertising); and/or

undertake web analytics to analyze traffic and other player activity to improve your experience.

Ad networks may collect this data through the use of cookies and other similar tracking technologies, and they may use a single tracking technology or multiple tracking technologies at the same time.

After clicking on a third-party advertisement, you may no longer be on a site or app controlled by us through which you are playing our games.

If you do want to receive customized in-application advertisements from third parties, your consent would be required. The practices of third-party companies delivering advertisements in our games are subject to those companies' own privacy policies.

3 Security measures

We share your data if necessary for safety, security, or compliance with law. Your data and the contents of all of your online communications in our games and between you and Swagtorious may be accessed and monitored as needed to provide our games and may be disclosed:

to satisfy any laws or regulations that apply

when we have to disclose the information in response to lawful requests by public authorities if our games are being used in committing a crime or to share data with other companies and organizations for the purposes of fraud protection and other security precautions to protect the rights or property of Swagtorious or applicable third parties.

4 Third-party service providers

We share your data with the third-party service providers and partners that we work with to bring you our games.

We will share your information with third-party companies who perform services on our behalf, like analytics, analysis, hosting services, customer service, marketing, and advertising optimization. We will also share your data with our third-party partners who assist us in delivering and optimizing our Services, such as our platform partners (Apple, Google, Facebook, Amazon, etc.). Where we share your data with third-party service providers and partners, we ensure that we have appropriate agreements in place to protect your information (as required by applicable data protection laws).

Facebook Ireland Limited (“Facebook Ireland”) and We are joint controllers when it comes to using a Facebook tool which enables you to connect your Facebook accounts to our games (Facebook Login). Also when you are joining Swagtorious group or fanpage on Facebook, Facebook Ireland and We are acting as joint controllers. The joint controller addendum can be found [here](#).

Information on how Facebook Ireland processes personal data, including the legal basis Facebook Ireland relies on and the ways to exercise data subject rights against Facebook Ireland, can be found in Facebook Ireland’s Data Policy. Facebook Ireland is responsible for enabling data subjects’ rights with regard to the personal data stored by Facebook Ireland after using Facebook tool.

5 Other third parties

We may share some of your information with other third parties, if we have your consent to do so.

In addition to the sharing described above, we may share your data with other third parties or allow them to collect your information from our Services in some ways not specifically described in this Privacy Policy if we have your consent to do so.

SWAGTORIOUS'S PARTNER LIST

Swagtorious's Partner List includes a list of trusted advertising network companies with which Swagtorious works directly or indirectly, and which may receive your personal data and further process according to their own rules. We encourage you to review the privacy policies of our partners to ensure that you understand their treatment of personal data that they may process. Please note that Swagtorious may not directly work or share personal data with all of the companies listed below. From time to time, we may add partners to this list when we make new agreements with partners who are committed to protecting your personal data.

Company Name Privacy Policy

Chartboost, Inc. <https://answers.chartboost.com/en-us/articles/200780269>

Tapjoy, Inc. <https://www.tapjoy.com/legal/tapjoy-users/#privacy-policy>

AdColony, Inc. <https://www.adcolony.com/privacy-policy/>

AppLovin Corporation <https://www.applovin.com/privacy/>

Unity Technologies Finland Oys <https://unity3d.com/legal/privacy-policy>

ironSource Ltd. <http://www.ironsrc.com/wp-content/uploads/2019/03/ironSource-Privacy-Policy.pdf>

Google Ireland Limited <https://policies.google.com/privacy?hl=en-US>

Facebook Ireland Limited <https://www.facebook.com/privacy/explanation>

Twitter, Inc. (Mopub) <https://www.mopub.com/legal/supply-side-policy/>

InMobi Pte. Ltd <https://www.inmobi.com/privacy-policy/>

OpenX Software Ltd. <https://www.openx.com/legal/privacy-policy/>

Pubmatic, Inc. <https://pubmatic.com/legal/privacy-policy/>

Smaato, Inc. <https://www.smaato.com/privacy/>

Verizon Media EMEA Limited

<https://www.verizonmedia.com/policies/us/en/verizonmedia/privacy/index.html>

Fyber Monetization Ltd. <https://www.fyber.com/privacy-policy/>

DATA SUBJECTS' RIGHTS

1 European Countries 'Players' Rights

If you are a player located in the European Countries, you have certain rights with respect to your personal information.

If you are located in the European Countries, you have the following rights:

You can access or request deletion of your personal information by submitting a request through the Contact Us link within our Applications or directly send us an email to our support team at support (at) Swagtoriousgames.com

You can correct or update your personal information through the settings within our Applications or directly send us an email to our support team at support (at) Swagtoriousgames.com

You may object to processing of your personal information

You may ask us to restrict processing of your personal information or

You may request portability of your personal information through the Contact Us link within any of our Applications or directly send us an email to our support team at support (at) Swagtoriousgames.com

You can opt-in or opt-out of marketing communications we send you by following the instructions in “Opting in / Opt out of marketing communications from Swagtorious” below.

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time through the settings within our Applications or by requesting this change through the Contact Us link within our Applications or directly send us an email to our support team at support (at) Swagtoriousgames.com. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information which is to be in Swagtorious’s case –the leading protection authority is Polish President of the Office of Data Protection. You may also contact your local data protection authority. For more information, please contact such authority.

To exercise your rights to access or deletion, please submit a request through the Contact Us link within our Applications or directly send us an email to our support team at support (at) Swagtoriousgames.com. We ask that you submit all requests through the Application itself to ensure that, at a minimum, we have sufficient information about the user to enable us to service the request. While you send us an email message we may ask you to provide more information about you like: player ID in our game. If you do not provide us with accurate information or we do not have access to your email address and your player ID and sufficient consent, if required, we will not be responsible for failure to exercise your rights as we will not be able to identify you as our player. We respond to all data protection requests we receive in accordance with applicable data protection laws.

2 Accessing and deleting personal data held by Swagtorious

You can request a copy of or deletion of your game account data through our game.

To review and update personal data (including given us consents) associated with your Swagtorious player profile in certain games, visit “Settings” within that Application.

If you want to review or delete your game account, please submit a request through the Application itself or through our support.

For deletion requests, we will take reasonable measures to delete your personal data from our records. We will keep certain records (e.g., personal data relating to payments or customer service matters) where we need (and have rights) to, such as for legal or accounting purposes. We will also keep data in order to exercise, defend, or establish our rights.

3 Managing personal data from third-party applications and from your mobile device

To manage the information we receive from third-party applications and from your mobile device, use the settings provided by the third-party application and your mobile device.

You also can manage many aspects of data collection and use from your mobile device by visiting the “settings” of your mobile device or web browser and reviewing the access permissions of each game / application.

Once we receive your data from a third-party application / platform or your mobile device, that data is stored and used by us in accordance with this Privacy Policy. You may access and update that information as described above.

4 Opting In or Out of marketing communication with Swagtorious

You can unsubscribe from promotional emails by clicking the “unsubscribe” link. You can opt out of mobile push notifications in your device’s settings page.

If you want to stop receiving push notifications, which are messages an app sends you on your mobile device even when the app is not on, you can turn off push notifications by visiting your mobile device's "Settings." Many of our games also offer the ability to turn off push notifications in the in-game "Settings."

Please note that if you opt in or out of receiving marketing communications from us, we may still communicate with you from time to time if we need to provide you with information about the games you are using from us, if we need to request information from you with respect to a transaction initiated by you, or for other legitimate non-marketing reasons, for example, if we update this Privacy Policy, our Terms of Use or Swagtorious End User License Agreement.

5 Opting in or out of third-party tailored advertising

While you give us your consent for obtaining the personalized advertising from our third-party partners, you can opt in or opt out of third-party customized advertising through your device Settings and other third-party opt-in or opt-out tools.

If you do not want to receive tailored in-application advertisements from third parties that relate to your interests on your mobile device, you may adjust the ad tracking settings on your device (such as turning on "Limit Ad Tracking"). You can also reset the "Advertising Identifier" (such as an IDFA) from your mobile device's settings, which will prevent continued use of existing behavioral data tied to your previous "Advertising Identifier." Further, depending on the platform provider (such as Apple or Google), you may be able to download apps that offer to provide you with control regarding the collection and use of cross-app data for tailored advertising.

All of the opt-in or opt-out tools described in this subsection are provided by third parties, not by us. Swagtorious does not control or operate these tools or the choices that advertisers and others provide through these tools.

Please note that you may still receive third-party advertisements in our games after using these tools, but the advertising you see would not be customized to your interests or needs.

PRIVACY POLICIES OF LINKED THIRD-PARTY SERVICES

We are not responsible for the ways in which third parties use your data (other than our partners acting under our guidance). Our websites and games may contain advertisements from third-party services that may link to their own websites or services. We are not responsible for the privacy practices or the

content of these parties. If you have any questions about how these entities use your data, you should review their policies and contact them directly.

CHILDREN'S ONLINE PRIVACY PROTECTION RULE

We do our best to ensure that we do not collect information from or about children. Generally, our games are not intended for children under the age of 16 (collectively, "Children"). Children are not permitted to use our games, and we do not knowingly collect any personal data from Children.

Though our Services do not target Children, we may collect age information before allowing a player to proceed for certain games. For players who identify themselves as Children in our age-gate on such games, if we allow Children to use the games, we will either provide a version of that games that does not collect, use, or disclose "personal data" (as defined in the Children's Online Privacy Protection Act ("COPPA")), except as permitted by COPPA or obtain legally valid legal guardian consent.

If we learn that we have inadvertently gathered personal data that is not subject to a COPPA exception from a Child, we will take reasonable measures to promptly remove that information from our records.

TRANSFER OF DATA

When you use our games, your personal data may be sent outside of the European Countries, for example, to the United States, Israel and Hong Kong and possibly other countries. When we transfer, store, and use personal data collected in the European Countries outside of the European Countries, we comply with our legal obligations and ensure that your personal data is subject to suitable safeguards (such as encrypting communication) or transferred to "approved" territories.

As a global company, we may transfer your personal data to our "Affiliated Entities," located in European Countries and outside like United States, Israel and Hong Kong which are any other corporate entities under common ownership with Swagtorious, or to our business partners and service providers from time to time for our legitimate business purposes. For example, Swagtorious provides certain services to its Affiliates.

We store personal data about players and visitors to our sites on servers located in the United States, and we may also store this information on servers and equipment in other countries. Personal information collected in the European Countries may be transferred to, and stored at, a destination outside of the European Countries. The data we hold may also be processed by employees operating outside of the European Countries who work for us, one of our Affiliated Entities, or one of our business partners or service providers. This staff may be engaged in, among other things, marketing communication with players and product development. When we transfer your personal data

internationally we will take reasonable steps to ensure that your data is treated securely, lawfully, and in the manner we describe here. Please note that laws vary from jurisdiction to jurisdiction, so the privacy laws applicable to the places where your data is transferred to or stored, used, or processed in, may be different from the privacy laws applicable to the place where you are resident.

If we share your data with entities which are located outside of the European Union or European Economic Area (EEA) we make sure that these entities ensure an adequate level of protection and the transfer is supported by appropriate safeguards, e.g. the adequacy decisions of the European Commission or the European Commission's standard contractual clauses for the transfer of personal data to a country outside the EEA. These standard contractual clauses are available here. We treat exceptionally and pay attention to an assessment of permissibility of personal data transfers to the USA in order to eliminate all related risks.

You can direct any questions, concerns or complaints regarding Swagtorious's handling of personal data or compliance with safeguards of the transfer outside the European Countries to Swagtorious at:

ATTN: Data Protection Officer

Swagtorious.

Address: Strorrady Świętosławy 1A/501, 71-602 Szczecin, Poland

dpo@Swagtoriousgames.com.

We will answer your questions in a timely and complete manner.

If your complaint still is not resolved through these channels, an additional binding arbitration option may be available to you.

DATA RETENTION

We'll keep your information for as long as necessary to provide you with the Services, maintain our legitimate business operations, and/or exercise, defend or establish our rights.

How long we retain your personal information depends on why we collected it and how we use it, but we will not retain your personal information for longer than is necessary for our business purposes or for legal requirements.

We will retain personal information about you and connected with your account and/or the Services you use from us for as long as you have an active account with us. We will take reasonable measures to delete this personal information if you delete your account. However, you acknowledge that we may retain some information after you have closed, or we have deleted, your account with us where necessary to enable us to meet our legal obligations or to exercise, defend, or establish our rights.

SECURITY OF YOUR INFORMATION

We work to protect your information but you as a player also have to take certain steps.

We implement reasonable and appropriate security measures to help protect the security of your data and to ensure that your data is treated securely and in accordance with applicable laws.

It is important that you protect and maintain your Swagtorious account's security and that you immediately tell us of any unauthorized use of your account. If you access our Services through Facebook and your account is hacked or otherwise compromised, this may lead to someone accessing or deleting your game accounts without your permission. So, be careful to keep your Facebook account information, including your social network account password, secure as well. We urge you to log out of your Swagtorious account and any social network account you have used to access our Services when you are finished using them.

JOINT CONTROLLERS

With respect to your personal data, Swagtorious. are joint controllers, which mean that both, Swagtorious. decide about purposes and means of processing (mentioned in this Privacy Policy).

Swagtorious. as joint controllers have agreed upon the relevant arrangement determining their respective responsibilities for compliance connected with the personal data security.

Swagtorious is the company responsible mainly for the distribution of games and financial service of games and Swagtorious. is responsible mainly for the performance of information obligations towards the players of our Services and for ensuring the performance of players' rights. To ensure the protection of your rights, Swagtorious. have appointed a joint Data Protection Officer (please see the following section).

DATA PROTECTION OFFICER AND CONTACT

Swagtorious has a Data Protection Officer (the “DPO”), who is the person at Swagtorious group responsible for all matters related to data protection and privacy matters. The DPO is the designated contact for data protection issues for both Swagtorious. and Swagtorious Global Ltd. You can reach Swagtorious’s DPO at the following address:

ATTN: Data Protection Officer

Swagtorious.

Storrady Świętosławy 1/501, 71-602 Szczecin, Poland

dpo@Swagtoriousgames.com

If you have a customer service-related issue, please contact our Support Team instead of contacting the Data Protection Officer.

If you want to request access to the information that Swagtorious has on file for you, please contact our Support Team. If you want to request that Swagtorious correct any information that Swagtorious has on file for you, please contact our Support Team. If you want to request that Swagtorious delete information that Swagtorious has on file for you, please contact our Support Team.

Please be sure to include your name or your player ID or address and email address in any correspondence to us so that we can respond to your inquiry in a timely manner.

REWARDS PROGRAM

The Swagtorious Rewards Program for our most loyal players. You can participate in the Rewards Program after you reach a certain engagement threshold in one of our games. The available benefits will be unlocked at various points and include special events, in-game gifts or other perks. The Rewards Program is a part of our game experience and acts as a thank you to the most engaged players. In order for you to be a member of our Rewards Program we will obligatory need your email address to communicate with you re. this program and we process it as necessary to perform our contract with you.

At times, we might need some more data to actually provide you with a benefit, e.g. to send you a gift in real life, organize events for our best players, communicate with you easier. In that case we’ll let you know all the details beforehand and give you a chance to choose what works best for you: whether you share your data such as: your first name, last name, home address, phone number, your social media

details with us or opt not to. Either way will be fine with us. If you decide to share, we will use them based on our legitimate interest: to deliver something exciting to you or reward you in some other way, facilitate communication. If not, you won't receive the benefits, but you will still be able to change your mind in the future when you qualify for another reward. The choice is yours every time.

It may also happen that in the course of our closer communication you share with us some information that are treated as special categories of personal data such as racial or ethnic origin, political opinions, religious or philosophical beliefs or information concerning health – please however note, that we do not collect such data by ourselves and we will never ask for it.

We will store your personal data for as long as necessary to achieve the goal of letting you be part of the Rewards Program. The data might be shared with third parties providing intermediary services in the process, e.g. with a mailing company, event organizers.

When you become eligible to benefit from the Rewards Program, we will let you know. You will also get these details to remind you how it works and why we ask for something new.

Please remember that the information in this section is limited to processing details that may vary from our general remarks in this Privacy Policy. For other details, please check the other sections of this Privacy Policy.

CALIFORNIA PRIVACY NOTICE

Last Updated July 1, 2020

This California Online Privacy Protection Act Notice (this Section) is part of the Swagtorious Privacy Policy and specifically provides information on how we collect, use, disclose and otherwise process personal information of our players who are individual residents of the State of California within the scope of the California Consumer Privacy Act of 2018 (the CCPA).

Terms in this California Notice section of the Swagtorious Privacy Policy mean the same as they are defined elsewhere in our Privacy Policy or as defined in the CCPA. We refer below to “players” and this is meant to include players of our games as well as people who access our websites or other services.

Collecting Personal Information

The CCPA defines “Personal Information” as “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household” and the use of Personal Information in this Section has this meaning.

We have provided below the categories of Personal Information we have collected about our players in the preceding 12 months, as well as the source of the Personal Information and our business purposes for collecting the Personal Information:

Category of Personal Information	Source of the Personal Information
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Identifiers in (A)	
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(for example: real name, alias, postal address, unique personal identifier, online identifier, IP address, device or WiFi location)	
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Our players	
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Our players’ devices	
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Social networks	
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(for example, Facebook)	
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Third parties (e.g., marketing partners, data or analytics services)	
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information defined in Cal. Civ. Code 1798.80(e)	
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(for example from the statute: name, address, telephone number)	
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Our players	
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Our players’ devices	
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Social networks	
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(for example, Facebook)	
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Third parties (e.g., marketing partners, data or analytics services)	
--	--

protected classifications	
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(for example in the statute: age, gender)	
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Our players

Our players' devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

commercial information

(records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

Our players

Our players' devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

internet or other electronic network activity information

(browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)

Our players

Our players' devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

geolocation data

(examples as already mentioned above such as IP address)

Our players

Our players' devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

electronic information

(in the sense, for example, that “electronic information” includes data as a result of the player’s interaction with the device to play the game)

Our players

Our players’ devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

inferences drawn from the above

Our players

Our players’ devices

Social networks

(for example, Facebook)

Third parties (e.g., marketing partners, data or analytics services)

We use the Personal Information collected above for the following business purposes:

improving and optimizing our games and our player’s experiences in our games (incl. analytics and reporting)

creating player accounts and allowing our players to play our games

identifying and suggesting connections with other players and personalize our games for our players and enable players to communicate with each other

communicating in-game updates and notifications, new games and new websites, and promotional offers that we think might be of interest to our players

protecting the safety and security of our games, websites and company (e.g., debugging, auditing & testing)

making our games available to our players

protecting our rights and property in connection with our games as well as complying with our legal obligations, resolve any disputes we may have with you or other players, and to enforce our agreements with third parties

preventing fraud or potentially illegal activities, and to enforce our terms of use

managing and delivering customized advertising and marketing (e.g., user acquisition, direct marketing)

research & development (including game and feature development, improvement, optimization and refinement)

administering promotional activities or events sponsored or managed by us or our partners

enabling our various teams within Swagtorious and our partners to work on development of our games and websites and better understanding of players' needs and wants

player services and support (e.g., responding to player inquiries, quality assurance, enhancements, & monitoring/auditing)

Pursuant to CCPA, Personal Information does not include publicly available information. For these purposes, "publicly available" means information that is lawfully made available from federal, state, or local government records, if any conditions associated with such information. "Publicly available" does not mean biometric information collected by a business about a consumer without the consumer's knowledge. Information is not "publicly available" if that data is used for a purpose that is not compatible with the purpose for which the data is maintained and made available in the government records or for which it is publicly maintained. "Publicly available" does not include consumer information that is deidentified or aggregate consumer information.

Disclosure of Personal Information

We disclose in this Privacy Policy that we share personal information within the Swagtorious group (and among our joint controllers) as well as with certain third parties. More specifically, we may allow the following categories of recipients to access Personal Information:

entities within our corporate group

cloud-based software providers (e.g., storage providers)

distribution channels

payment processors)

analytics providers

security providers

advertising and marketing partners (e.g., user acquisition partners and ad monetization partners)

as required by law

Swagtorious does not sell and has not sold Personal Information of California residents to third parties for a commercial purpose in the preceding twelve months, regardless of a player's age.

We do not sell personal information of California players to third parties, regardless of the player's age. We offer advertising in some of our games; if you want to opt out of personalized advertisements in our games, please do so within the game. You can read more about this as well in the Privacy Policy section here: [Opting In or Out of marketing communication with Swagtorious](#).

Your California Privacy Rights

In addition to any other rights under the law or elsewhere in the Privacy Policy, you have the right to the following:

Right to Know

California residents have the right to request that we disclose certain information about our collection and use of your personal information over the past 12 months.

The categories of personal information we collected about you.

The categories of sources for the personal information we collected about you.

Our business or commercial purpose for collecting that personal information.

The categories of third parties with whom we share that personal information.

The specific pieces of personal information we collected about you (also called a data portability request).

If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

identifying the personal information categories that each category of recipient obtained.

We can only provide you with this information if you send us a verified request, which we explain further below.

Right to Delete

You have the right to request that we delete your Personal Information that we have collected from you and that we have retained, subject to certain exceptions.

Once we receive and confirm your verified request, we will delete (and request to our service providers the same) your Personal Information that we have collected and retained, unless an exception applies.

We can only delete your Personal Information if you send us a verified request, which we explain further below.

Other Rights

You also have the right to designate an authorized agent to make a request under the CCPA on your behalf and the right not to be discriminated against if you exercise any of your rights with us under the CCPA.

In order to be authorized to act on your behalf, your authorized agent will need to provide us with proof that they have written permission to act on your behalf. The request will also need to be a verified request.

Making a Verified Request

In order to exercise your rights under the CCPA, we will need to get from you a verified request. There are two ways to send us a verified request:

The first way is to send us the request through our games. This is the preferred method because then your PlayerID comes to us automatically. Please reference "CCPA" in your request.

The second way is to send an email to dpo@Swagtoriousgames.com. When you send us the request, you will need to include your Player ID. Please reference "CCPA" in your request.

Please make sure that you include sufficient information in your request as to what you want from us. For example, if you want us to delete your data, please tell us that. If you want to request a copy of your data, please tell us that.

We may need to verify your identity before processing any request; but we will try to limit the additional Personal Information that we collect in order to process your request. We reserve the right to decline a request to exercise rights under CCPA, particularly if we are unable to verify your identity.

If you are using an authorized agent, the authorized agent will still need to submit a request as above along with proof of the authorization.

You can make a request up to twice every twelve months.

California Civil Code Section 1798.83 & Do Not Track Signals

A company that is subject to California Civil Code Section 1798.83 is required, if engaged in sharing data with third parties for direct marketing requests, upon request from a user, to disclose to its users the identity of any third parties to whom the business has disclosed personal information within the previous calendar year, along with the type of personal data disclosed. The company is required to respond to this request once per calendar year. Inasmuch as the above information is not already provided by us, our California-resident players should make any such request through the Contact Us link found in our games or by contacting the DPO using the contact information in this Privacy Policy. When you contact us, please make sure to reference "Shine the Light" in your request.

A company subject to California Business and Professions Code Section 22581 is required to allow any California resident under age 18 who is a registered user of an online site, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances. Inasmuch as the above information is not already provided by us, our California-resident players should make any such request through the Contact Us link found in our games or by contacting the DPO using the contact information in this Privacy Policy. When you contact us, please make sure to reference "Shine the Light" in your request.

Additional Important Information

We do not currently respond to Do Not Track signals (e.g., from mobile devices, web browsers).

We may update our Privacy Policy, including or excluding this Section, from time to time with or without notice. When we make changes to the Privacy Policy, we will change the “Last Updated” date. All changes shall be effective from the date of publication unless otherwise provided in any notification of the changes.

If you access our games or websites from a third-party application or connect our games or websites to a third-party application (e.g., if you link your account with us to your Facebook account), you should also read that third-party application’s terms of use and their privacy policy.

NEVADA PRIVACY NOTICE

We do not sell personal information of Nevada residents to third parties and our websites do not allow players to play the games directly (the games must be downloaded or played on Facebook); however, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident and we provide Nevada residents the opportunity to opt out nonetheless.

To submit such a request, please contact us by email to dpo@Swagtoriousgames.com and make sure you include the words “Nevada opt-out” in the subject of your message as well as your PlayerID.

CHANGES TO OUR PRIVACY POLICY

We let you know about any material changes to our Privacy Policy. If we decide to make material changes to our Privacy Policy, we will tell you and other players by placing a notice in-game or on our website at www.Swagtoriousgames.com or by sending you a notice to your e-mail address we have on file for you before the change becomes effective (and we will ask for your consent where required by law).

Please also periodically check at www.Swagtoriousgames.com for updates of this Privacy Policy.