

# Privacy Policy

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## 1. Introduction

Game Garden Limited develops and publishes games for mobile devices and social networks under the name Game Garden. “**Game Garden**,” or “**we**” or “**us**” refers to Game Garden Limited and its contractors. Game Garden respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy applies whenever you play our games or otherwise access any of our other products, services, content, game-garden.com and/or other domains provided by Game Garden, together referred to as “**Services**.” This Privacy Policy describes:

- what types of information we may collect or that you may provide;
- how we process, store, and use the information and with whom we share it;
- how you can access and update that information or request its deletion;
- the choices you can make about how we collect, use, and share your information;
- how we protect the information we store about you.

This Privacy Policy does not apply to any third party websites, services, or applications, even if they are accessible through any of our Services.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices and do not want Game Garden to collect, store, use, or share your information in the ways described, you should not play Game Garden’s games or use other Game Garden’s Services.

By downloading, accessing and/or playing our games, or interacting with our websites or other Services, you agree to the collection and use of your information in accordance with this Privacy Policy, including consenting to Game Garden’s and our advertising partners’ use of your data for targeted advertising purposes as described in the Marketing and Advertising sections of this Privacy Policy. If you have any concerns about providing data to us or having it used in any manner permitted in this Privacy Policy, you should not use our Services. As set out in the End User License Agreement relating to our Services, you must be at least 13 years old to access and/or use our Services.

## 2. About Us

We are a company called Game Garden Limited organized under the laws of Cyprus. Our registered office is 2A Ilia Venezi Street, Athienitis Strovolos Park, Office 402, 2042, Nicosia, Cyprus. We develop and distribute our games throughout the world in cooperation with other companies operating pursuant to a contract with Game Garden.

### 3. Information We Collect and How We Collect It

#### Information We Collect Automatically When You Play Our Games or Use Our Services

By downloading, accessing and/or playing our games or using our other Services, you consent to the collection of information about you by us. Most of this data comes directly from you or your device. We use this data to provide our games and Services to you, including for the purposes of optimization, research and analytics, offering promotions and competitions, preventing fraud, customizing in-game offers, and verifying purchases. We may also use it for the other purposes set out in this Privacy Policy, including for marketing and advertising purposes.

##### (a) On a Mobile Device

When you access our games and Services from your mobile device, we automatically gather the following categories of information:

- **Unique Player ID** automatically created for you by our game server. This ID is used, for example, for identifying your in-game actions, tracking your progress, and matching your purchases to your account. This information is what allows us to assist you if needed, such as correcting any errors with in-game purchases or assisting you to restore your progress.
- **Device Information.** We collect certain types of information about your mobile device and internet connection for the purpose of game analytics, optimization of our games and Services for various devices, selection of appropriate localization version for your device, to offer you relevant promotions within our games and Services, and for marketing and advertising purposes as described in more detail below. We collect and process the following:
  - platform type/store you use for app purchases, such as iOS, Google, Amazon, etc.;
  - information about your operating system;
  - unique device identifier generated from the device, if permitted by your device settings, like your MAC Address, Identifier For Advertising (IDFA), Google Advertising ID (GAID), unique device identifier (UDID), and/or International Mobile Equipment Identity (IMEI);
  - your IP address to determine the country;
  - the country in which you are located;
  - information about the make and model of your device;
  - the language settings of your device;
  - unique IDs for push notifications.
- **Usage Details.** We collect the following types of information about your gameplay for game analytics and improving our games and Services by making them more responsive to your needs and to provide customer support:
  - date and time you installed our game or Service;
  - date and time you accessed our game or Service;
  - your game progress and various in-game activities, such as, for example, spending in-game currencies;

- system and game error reports.
- **Payment Information.** If you make in-game purchases, we receive limited information about the payment, such as unique transaction ID, date and time of payment, and the payment amount. We need this information to resolve any errors that may occur with payment processing through the appropriate store or platform to ensure that your purchase can be applied to your account.
- **Creating a User Name.** Game Garden provides you an option to create a nickname, which will be matched with your game profile, for the purposes of in-game competitions and leaderboards.
- **Logging In with Social Network or Other Accounts.** Where we make this available, you can choose to log in to your game profile using your account details with a third party network, such as Facebook, Apple Game Center, Google Play Game Services, or Amazon Game Circle. If you do this, you will be able to use your account to log in on multiple devices and synchronize progress across those devices. Where available, you will also be able to see which of your friends are playing the same game and their progress through the games (and they will be able to see you and your progress), or access other functionality we make available in our games and other Services, such as inviting friends to play or sending in-game gifts.

If you choose to login with a social media or other account, we will also receive your first and last name, photo, and a list of your friends who play the same game or use the same Service. We will also receive access to your e-mail address, if the social media platform shares it, but we will not store it. You can control what information is shared with us from your social media account by reviewing the privacy controls on the appropriate third party network.

(b) On a Social Network

If you play Game Garden’s games or access any of our other Services on a social network like Facebook, Game Garden receives certain information about you from the social network automatically. The information we receive depends on the Game Garden game you are playing, the social network, and your privacy settings and your friends’ privacy settings on that social network.

We will automatically gather the following information when you play our games or access our Services through social media networks:

- **Unique game ID** automatically created for you by the social network. This ID is used, for example, for identifying your in-game actions, tracking your progress, and matching your purchases to your account. This information is what allows us to assist you should you encounter any issues with the games, such as correcting any errors with in-game purchases or assisting you to restore your progress.
- **Device Information.** We collect certain types of information about your device and internet connection for the purpose of game analytics, optimization of our games and Services for various devices, selection of appropriate localization version for your device, to

offer you relevant promotions within our games and Services, and for marketing and advertising purposes as described in more detail below. We collect and process the following:

- platform type/store, such as Facebook or other social network;
  - information about your operating system;
  - information about the computer you are using;
  - your IP address to determine the country;
  - the country in which you are located;
  - the language settings of your device.
- **Usage Details.** We collect the following types of information about your gameplay for game analytics and improving our games and Services by making them more responsive to your needs and to provide customer support:
    - date and time you installed our game or Service;
    - date and time you accessed our game or Service;
    - your game progress and various in-game activities, such as, for example, spending in-game currencies;
    - system and game error reports.
  - **Payment Information.** If you make in-game purchases, we receive limited information about the payment, such as unique transaction ID, date and time of payment, and the payment amount. We need this information to resolve any errors that may occur with payment processing through the appropriate store or platform to ensure that your purchase can be applied to your account.
  - **Creating a User Name.** Game Garden provides you an option to create a nickname, which will be matched with your game profile, for the purposes of in-game competitions and leaderboards.

When you choose to play our games or use our Services on the desktop version of Facebook or other social network, we will receive some of your account information, which will be automatically associated with your game profile. The kinds of information we will receive depends on your settings on your social network account, but generally your first and last name, profile photo, and a list of friends who play the same game or use the same Services. We may receive your e-mail address if the social network provides it, but we do not store it.

We recommend that you review the social network's privacy policy to learn more about the information they share with us and other developers and the choices you can make to limit the accessible information.

### **Information You Provide to Us**

When you download our games or use our Services, we may ask you provide certain types of personally identifying and non-personal information. This may include:

- Information you provide to us when you enter a contest or promotion sponsored by us, and when you report a problem with the Services;

- Records and copies of your correspondence (including e-mail addresses and phone numbers), if you contact us;
- Details of transactions you carry out through the Services and of the fulfillment of your orders.

### **Payment Information**

If you purchase a license to use in-game virtual currency or virtual items in a game you play on a social network or that you downloaded on your mobile device, Game Garden does not receive or store any billing and payment information that you provide when your purchase is processed by a mobile app store (like Apple or Google) or by the social network (like Facebook). Our End-User License Agreement explains our policies and terms relevant to our charges, billing practices, third party credits and virtual currencies. Please note that purchases of third-party credits or currencies may also be subject to those parties' policies.

### **Customer Support Correspondence**

When you ask for help from our Customer Support team, we will collect and store the contact information you give them (generally, your name and e-mail address), information about your game play and activity on our Services, and your Game Garden player and/or social network ID number, and other information as may be requested by our Customer Support team in order to assist you, such as screenshots or payment transaction ID. We will also store all communications you have with the Customer Service team and any information in those communications in order to provide support.

For your convenience, we provide the option of contacting our Customer Support from the mobile applications and the desktop Services. If you choose to use our in-game or in-Service interface, some information will be added to your support ticket automatically, such as your unique player ID assigned to you when you downloaded the game, platform, information about your operating system, information about your device or desktop computer, and your screen size.

### **Marketing and Advertising**

Our games and Services may include advertising for third party products and services, and we, or our third party partners, may send you marketing communications about other Game Garden games and related services based on your interests. For example, we may serve ads within our games and Services or place ads on third party websites or apps. Unless you opt out as explained below, you consent to us and our advertising partners collecting and using information about you to improve marketing and advertising so that we can show you relevant third party ads in our games or Services.

We and our third party partners use ad identifiers, such as ID for Advertisers (IDFA), Google Advertising ID (GAID), or unique device identifier (UDID), and other information collected from your devices, social networks, and provided by you to offer you ads that may be relevant to you within our games and Services.

When you play our games or use our Services, the ad identifiers and other information from your device is collected and shared with advertising partners to enable the delivery of ads to your device. Our marketing and advertising partners may combine such information with data

they collected from you elsewhere (for example when you used their services) and use it to serve you more relevant ads or to improve the accuracy of their targeting and measuring systems.

By playing our games and using our Services, you consent to the collection and use of your data for targeted advertising purposes by our partners as set forth in this Privacy Policy and our partners' policies, including, but not limited to the following: [Unity](#), [Appsflyer](#), [Chartboost](#), [Fyber](#), [ironSource](#). You can refuse or withdraw your consent to such use at any time by preventing your device's ad identifier being used for interest-based advertising by updating your device's settings.

Opting out of interest based advertising and marketing will not prevent you from being able to play our games or use our Services and will not disable the advertising within the games or Services, but such ads will no longer be targeted based on the information that we hold about you. The ads may still be based on the game you are playing or the Service you are using or the region in which your device is located.

### Cookies

Most of our websites do not use cookies for any purposes. Game-Garden.ru and Game-Garden.com use cookies solely to save your language preference and do not use any type of third-party cookies or analytics.

## **4. How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information, to:

- operate, improve and optimize our Services and our players' experiences;
- provide technical support and respond to players' inquiries;
- protect Game Garden's rights and property in connection with the Services and enforce the terms of our End User License Agreement;
- notify you when in-game updates, new products or promotions become available;
- comply with our legal obligations, resolve any disputes we may have with you or other players, and enforce our rights arising from any contracts entered into between you and us, including for billing and collection, or between us and third parties;
- conduct research;
- and fulfill any other purpose for which you provide it.

The usage information we collect helps us to improve our Services and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize our Services according to your individual interests;
- Recognize you when you use the Services.

## 5. Sharing Information

We may disclose or publish anonymous aggregated information about our users (information about you and other players collectively that is not intended to specifically identify you) and other non-personal information about our players for industry analysis, demographic profiling, marketing, analytics, and advertising and other business purposes.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates, contractors, service providers and other third parties we use to support our business. We contractually require these third parties to maintain the confidentiality of the information we share with them, and we contractually require them not to use your information for anything other than to provide services on our behalf.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- To facilitate your interactions with your friends on social networks. If you play through a social network, your social network friends will see your name, profile photo and descriptions of your game activity.
- With your consent.
- To provide you with Offer Walls. Game Garden games or their purchase pages may display an “offer wall” that is hosted by an offer wall provider. The offer wall allows third party advertisers to provide virtual currency to players in exchange for interacting with an advertisement or completing a marketing offer that may include signing up for an account with one of those advertisers. These offers are not made by Game Garden. These offers may be made available to you based on certain technical information, like your geographic area or de-identified demographic information. To properly credit your player account and to prevent fraud, a unique identifier, in some cases your social network ID or Game Garden player ID, will be shared with the offer wall provider.
- To comply with any court order, law or legal process, including responding to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the Services EULA and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Game Garden, our customers, or others.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Game Garden’s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Game Garden about our players is among the assets transferred.

## 6. Your Choices about Our Collection, Use and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly.
- **Information from Social Networks.** To manage the information Game Garden receives about you from a social network, like Facebook, where you play our games or with which you link a game on your mobile device, you will need to follow the instructions on that site for updating your information and changing your privacy settings.
- **Information from Your Mobile Device.** You can manage some aspects of information collection and use by visiting the “settings” menu of your mobile device and reviewing the permissions for each application or “app.”

If you want to review, delete, or change the information Game Garden has about you or have additional questions, e-mail us at [info@game-garden.com](mailto:info@game-garden.com). Please note that certain records, for example those related to customer service matters, will be held for legal and accounting purposes.

## 7. Legal Bases

Every time we collect and process your information, we do so in accordance with one of the following legal basis:

- Contractual Necessity—for data we use to provide you with Services you have requested;
- Legal Obligation—for data we use to comply with our legal obligation or to respond to a lawful request for information;
- Legitimate Interest—for data we use for purposes that are not harmful to your privacy and can be reasonably expected from the context of your use of our games and Services, such as analytics, research, marketing, advertising, and continuous improvement of our games and Services; and
- Consent—you consent to collection of data when you install our games and you can withdraw your consent at any time by uninstalling our games.

This Privacy Policy explains some way of opting out of certain types of information collection and processing. However, if you continue to play our games and use our Services, we will still collect some personal information about you. If you do not want us to collect any personal information about you, you should stop playing our games and using our Services.



## **8. Our Policies Concerning Children**

Our Services and websites are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. Children under 13 should not use our websites or games at any time. If we learn we have inadvertently collected or received personal information from a child under 13, we will take reasonable measures to promptly remove that information from our records. If you believe we might have any information from or about a child under 13, please contact us at [info@game-garden.com](mailto:info@game-garden.com).

## **9. International Operations and Transfers of Information; Retention**

We store your information on servers, which are primarily based in Germany. We may also use servers and engage providers that are located outside the EEA, including in the United States and Russia, in order to process and store your information and to provide services to us.

As part of our international operations, we may transfer data from time to time to affiliated entities or third parties to jurisdictions outside the EEA. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to the places where your information is transferred to or stored may be different from the privacy laws applicable in the country where you reside. We take steps to ensure that there are adequate safeguards and mechanisms in place to allow the transfer of your information across borders outside of the EEA.

Game Garden keeps your information for so long as your account is active. We deem an account to be active for a period of 60 months from the last interaction with our games or Services. Game Garden will also retain information for as long as it deems necessary for the purposes described in this Privacy Policy or to comply with its legal obligations.

## **10. Data Security**

We have implemented appropriate measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure, and we are committed to the protection of customer information. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy by us and our suppliers who process personal information on our behalf.

Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## **11. Changes to Our Privacy Policy**

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

## **12. Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [info@game-garden.com](mailto:info@game-garden.com)