

# PRIVACY APP USERS AND WEBSITE

ACCORDING TO EU REGULATIONS 2016/679

Last update: 11/10/2019

This notice describes how we collect and process personal data that is provided for use of our application, our games and our web site (hereinafter, respectively, "App", "Games", "Website" and collectively referred to as "Services"), and what are your rights.

We understand the importance of protecting your personal information, we attach great importance to privacy and security, and we deeply committed to maintaining the trust you place in us.

Ofree Srl specifies that, in case of registration / authentication via Facebook / Google / other company, such individuals will continue to process your personal data independently from us and on the basis of consensus you lent to them. We recommend, therefore, to view the information given by these parties and control the privacy settings of your account to understand how data sharing takes place.

## 1 DATA PROCESSING

The data controller is the Company Ofree Srl, headquartered in Italy, 31100 Treviso (TV), Via E.Reginato 85/H, e-mail [privacy@ofree.it](mailto:privacy@ofree.it) (Hereinafter, "Ofree" or "Owner").

## 2 WHEN, WHERE AND HOW WE COLLECT DATA

By downloading, accessing, playing our games, interacting with our site or otherwise using our Services, you agree that your data is collected and processed in accordance with this Statement.

### When you interact with the App we collect:

- Data you provide to us directly by creating an account on our App: username, email address and password, personal data;
- data received from third in case of registration / authentication via Facebook / Google / other social: social account details, such as name, email, and profile picture, personal data, geographical location and any other data already that the company in question are allowed to move under the applicable legislation and / or consent freely given by you.
- Data collected automatically: Session data and details on the device (IP address, device model used, operating system), online information on the activities and game activity (information about access to the platform, game times, points scored, information relating to donations), analytical data (which may include data collected by cookies).

### When you interact with the site we collect:

- A. Data you provide to us directly filling in forms on the Website: name, email address and message content;
- B. Data collected automatically: Usage and session data (device model used, operating system, navigation software used, site of origin, time of the request), usage data and analytical data (which may include data collected by cookies).

The data and personal information is collected during various stages of your relationship with us, that is, when:

- create your account on our platform or when it authorizes a transfer of data to Facebook / Google / other company;
- log into your account on our App;
- Send messages by filling in the form on the Site;
- open or answer our emails;
- contact us;
- get support;
- visit any online page displaying our ads or content;
- places online comments on the sections of the Site community.

In addition, we receive personal data and other information in online and offline modes by third parties with whom we conclude business as traders, members of marketing, distributors, retailers and other companies or organizations with which we enter into agreements in support of our business and our operations including advertising partners and third-party data providers that provide us with supplementary or additional information about our customers ( "Business partners" collectively). This allows us to deliver a better experience and personalized.

### 3 PROCESSING PURPOSES AND LEGAL BASIS

The personal information collected at any time will be used for the following purposes:

- a. **allow you to use our services** By enforcing the terms and conditions of use of the App, including the creation of an account when you register (legal basis of the processing: execution of the contract or pre-contractual measures);
- b. **provide any assistance and support when necessary, technical notices, updates** (Legal basis of the processing: execution of the contract);
- c. **answer your questions and fulfill your requests** (Legal basis of the processing: execution of the contract);
- d. **provide the information required by the form of the Site** (Legal basis of the processing: consent);
- e. **fulfillment of specific legal obligations** (Legal basis: fulfillment of legal obligations);
- f. **operate, maintain and improve the App and Site**, analyzing user interactions with them (legal basis: legitimate interest, identified in our legitimate business interest);
- g. **promoting similar services** to those already purchased by sending e-mails and provided that no you did not get the opposite to such treatment (legal basis: legal interest);
- h. **prior consent to send commercial and promotional offers and other marketing activities** by e-mail, snail mail, social networks, sms, calls with operator and also by means of automated calling systems or call communication without the intervention of an operator (legal basis: consent);
- i. **consent, perform profiling**, In particular to analyze aspects related to personal preferences, interests, gambling habits.

The consent to the processing of data for the purposes referred to in point h) and i) is optional.

In other cases, the provision of data is required to give effect to the terms and conditions of use of the App and / or provide the requested information by filling in the form of the Site and to fulfill statutory obligations.

### 4 MINORS

To use our games and services you must have reached a certain age, which varies depending on the place of residence. For a full list of age restrictions by country, see the table below and please refrain from using our services if you are under.

COUNTRY	MINIMUM AGE
Austria	14
Belgium	13
Bulgaria	16
Croatia	16
Republic of Cyprus	14
Czech Republic	16
Denmark	13
Estonia	16
Finland	13
France	15
Germany	16
Greece	16
Hungary	16
Ireland	16
Italy	14
Latvia	13
Lithuania	14

Luxembourg	16
Malta	13
Netherlands	16
Norway	13
Poland	16
Portugal	16
Romania	16
Slovakia	16
slovenia	16
Spain	14
Sweden	13
Switzerland	16
UK	13
Rest of the world (excluding Korea)	13

## 5 COMMUNICATION TO THIRD PARTIES

For the aforementioned purposes, your personal data can be transmitted and processed by external parties, designated, if necessary, controllers or they can take the qualification of independent data.

These external parties belong, but not limited, to the following categories:

- accountants, legal advisors, career counselors and other professionals or consultants of the Holder;
- banks and insurance companies;
- Suppliers of services for the management of the computer system, data storage and services related to Holder's telecommunications networks;
- third parties who provide tools and services to help us better understand the preferences of users public bodies;
- trading partners;
- judicial or administrative authority and any other person to whom the disclosure obligation resulting directly from a rule of law.

The disclosure to third parties may also take place to counter fraud and criminal activities, and to protect our rights or those of our affiliates in the EU, the Business Partners and users, and those as part of legal proceedings that have effect on us and / or our affiliates in the EU, as is within our legitimate interests, to prevent fraud and to protect these rights.

Ofree reserves also share aggregate or anonymous information with third parties, including advertisers and investors. For example, Ofree could communicate to advertisers or investors the number of users who have played and the number of visits received from their websites. This information does not contain any personal information.

By using the Services, you agree to the possibility that your personal information is transferred to Ofree facilities and third-party partners that are shared in accordance with this Statement.

## 6 TRANSFER TO THIRD COUNTRIES

Your personal data may be stored or transferred outside the European Economic Area for the purposes described in this Policy.

When personal data is stored or transferred outside the European Economic Area, these operations take place in accordance with applicable laws and Ofree ensure a similar level of protection by implementing appropriate safeguards.

The transfers of personal data are carried out:

- to countries that according to the European Commission provide an adequate level of protection;
- to countries that do not offer adequate protection but where the transfer is covered in the standard contractual clauses of the European Commission or through the implementation of appropriate transfer solutions beyond borders to provide adequate protection.

## 7 TIME DATA STORAGE

Your personal information will be kept for as long as your account remains active and / or for the time necessary to provide the Services.

For the processing of data for promotional and marketing purposes, the data will be stored until the withdrawal of consent or, in the absence of revocation / opposition, for a period of 2 years.

If you close your account, your data will be stored for a longer time if this is necessary for the fulfillment of legal obligations, taxation and fraud prevention (if required by the rules) and, in any event, until the existence of a legal

obligation, a right or legitimate interest Ofree.

More information about the data retention period and the criteria used to determine this period can be requested by writing to.

## **8 OPTIONS AT YOUR DISPOSAL**

You can limit our communications with you and control some of the information you provide to us, even disabling the use of certain data across devices and the settings of your browser.

**Cookie:** You can control how your device and / or the browser share information with us (for further information please refer to our "Cookie Policy").

**Opposition to the use of data** In some cases, you have the right to object to the use of your personal information. In particular, you may object to the use of data on our part where we use them to pursue our personal interests related to our activities (including use for marketing and business needs of our management). For more information, see the section on the rights of users and that relating to the details on the right to object.

**Social Network:** You can control the sharing of your information with us when you connect to us through social platforms of third-party networks. Please also refer to the information privacy of social networks and the third to the settings of the Web sites of social networks or applications, to determine how you can adjust and manage interactivity between us and your accounts on social networks.

## **9 RIGHTS**

In relation to your personal information you have the following rights:

- ask whether it is an ongoing process your personal data and, if so, to get access to them;
- request the correction of your personal information in order to change any incorrect or incomplete information used by Ofree;
- request deletion of your personal information, so you get to Ofree the cancellation or removal of the same unless there is a valid reason to continue to use them;
- requested the restriction of the use of your personal information, so that Ofree suspending treatment;
- oppose, at any time, the processing of your personal data when Ofree uses them based on a legitimate interest of its own or a third party and your specific situation may lead you to oppose to such use;
- in specific situations, get in a structured format and electronically your personal data for transmission to another person and sometimes ask us to send it directly to a third party ( "right to data portability");
- revoke your consent at any time, in case it has been provided for the collection, processing and transfer of your personal data for a specific purpose, and, when receiving such a request, Ofree no longer use your information to one / and purpose, unless there is a further legal basis;
- submit a complaint to an authority control, if you believe that the processing of your personal data in violation of the current legislation.

## **10 DETAILS ON THE RIGHT OF OPPOSITION**

You may object, at any time and without giving any reasons, to the processing of personal data for direct marketing purposes, in the following ways:

- clicking on the unsubscribe link provided at the bottom of any e-mail that we sent you;
- sending an e-mail to [privacy@ofree.it](mailto:privacy@ofree.it)

## **11 CONTACT DETAILS**

For any queries or to exercise these rights, you can contact at any time, to Ofree by sending a notice by e-mail at [privacy@ofree.it](mailto:privacy@ofree.it)

## **12 MODIFICATION AND UPDATING INFORMATION**

Ofree can freely change, amend and / or update all or part of this information, giving information to users on its site. Please therefore consult the Site regularly, taking as reference the date of the last update indicated in the informative . In case of rejection of the changes, you must cease use of services and may require the owner to remove their personal information. Unless otherwise specified, the previous Statement will continue to apply to data collected up to that moment.