

Privacy Policy

(Updated October 22, 2021)

By installing this application, you accept our Privacy Policy. This document describes how we collect and store your personal data, which is required for the use of this application and our partners' related services.

We store and use your data, which is required to improve the quality of our services, in accordance with international law. You have the right to deny the use and storage of your personal data at any time.

1. Introduction

1.1. This policy describes: what information Wefun Studio. and its third parties collect through the Services, whether on your mobile device, computer, or any other device, platform or website, and why we collect it, how we use that information, and how you can exercise your privacy rights.

1.2. By installing, using or otherwise accessing the Services, you consent to the collection, storage, processing and sharing your Personal Data in the manners set forth in this Privacy Policy. We may use this data in different ways, but always do so lawfully in accordance with the legal bases set out in Section 10 below.

1.3. If you are at all concerned about the way that your Personal Data is used as authorized in this Privacy Policy, please refrain from using our Services.

1.4. It is not our policy to allow anyone under the age of 16 to provide personal data and we do not knowingly collect or solicit personal data about or direct or target interest-based advertising to anyone under the age of 16 or knowingly allow such persons to use our Services.

In some countries, you must be older than 16 years old to use our Services.

No one under the relevant age may provide any personal data.

If we discover that we have collected personal data about a child under the relevant age, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the relevant age, please contact us.

2. Information we collect and receive

We may collect and receive information which may be considered personal data according to applicable laws in a variety of ways. More specifically:

2.1. When you play our games, we may collect and store:

2.1.1. Information that you provide voluntarily such as name, email address, or other contact information, player name and password, profile photo, information submitted to our support via Services or email, the content of messages sent using our chat and messaging systems or other information you send us (such as data to identify a lost account).

2.1.2. Information that is collected and stored automatically from you and/or your device when you use our games, such as:

- data about your account, nickname and how you use the Services and interact with the Services (such as gameplay data, game progress, levels, scores, session length, preferred setting; which in-game adverts you may have viewed, in-game references or just game preferences, what friends you connect with);
- your IP address, Internet status, broad geographic location (e.g. country or city-level location), cookie identifiers;
- Device information, including type of device, device model, device operating system, device settings, its language or other technical data like device settings, screen size or processor, or combination of this data available from a device for a developer for checking the device compatibility with a particular application, application IDs, device ID, Advertising ID (unique identifiers associated with your device that advertisers use for interest based advertising), Vendor ID.

Whether we collect some or all of this information often depends on the type of device used and its settings. These technologies allow us and third parties (including marketers and advertisers) to recognise your device when you use websites and applications. They are consistent across all apps and thus allow cross-app tracking.

2.1.3. Data we collect from our partners:

- Data we receive if you link a third party tool with the Service (such as Facebook);
- Data to fight fraud (such as refund abuse in games or click fraud in advertising);
- Details of orders (such as items, date, amount, status, description, broad geographic location (e.g. country or city-level location));
- Data for advertising and marketing purposes;
- Data for analytics purposes, so we can provide you a better Service;
- Data from other group companies or third party companies who have obtained your consent or have another legal right to share such information with us (including publishing partners, platforms, advertising platforms and partners and data aggregator). This may include attributes about you and your interests, as well as other games and services you use, demographic and general location information. We will use this information as described in this Privacy Policy and subject to any limitations in the privacy policy of the company that collected the information from you.

2.2. When you visit our website

2.2.1. When you provide us with any feedback through means available to you on this website, including but not limited to the Contact Us we may collect and process personal

data which you provide to us, such as your name, e-mail address, telephone number or any other information you send us.

2.2.2. Information collected and stored when you use website automatically from your device or browser including your device's model, operating system, screen size, browser type, information of how you use the website (such as time and user's amount of visits, time spent on the website, IP address, data collected with cookies and similar technologies (such as "software development kits, or "SDKs").

2.3. If you are representatives of our Business Partners, Vendors or Corporate Customers

When you are representatives of our business partners, vendors of corporate customers, we may collect and receive:

2.3.1. Any information from you directly;

2.3.2. Any information from your employer or other third parties (e. g. from publicly available sources or during networking events).

2.4. We may from time to time ask you for your consent to collect other information from you or your device. If we do this, we will tell you what information we would like to collect, why we need it and what we'll use it for.

2.5. Please note we do not collect or store any payment information from you when you purchase items via our mobile apps (such as those you can purchase in the App Store, Google Play, Microsoft Store, Amazon Appstore, Facebook or other platform).

2.6. Some of this information may be collected using cookies, small files that store information on your device to help us optimize the use of our Services and/or similar technologies (such as "SDKs" or software development kits). Some of the cookies are "1st party," from the website itself, and others are "3rd party," belonging to advertising and analytics entities or social networks. Cookies are typically used to quickly identify your device and to "remember" your device during subsequent visits for purposes of functionality, preferences, and website performance. You can disable cookies on your device or set your device to alert you when cookies are being sent to your device; however, disabling cookies may affect your ability to use the Services.

2.7. Please note Wefun Studio does not guarantee the protection of any Personal Data you decide to make public in your account, or that you may post in comments, submitted through the Services or make otherwise visible to others including but not limited to, chats, forums, blogs where you can post your Content. We have no responsibility for how that information is used by other parties. So please be careful when you submit any data through the Services.

2.8. We may also create an Account ID which helps us identify you for supporting purposes when you use the Service.

3. How is your Personal Data used?

3.1. First and foremost, we use personal data when processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of the data subject prior to entering into a contract.

Accordingly, we use your data as follows:

- to provide you with the Services;
- to contact you, whether for customer service purposes or to send information regarding our Services;
- to manage your account and improve your experience when using our Services;
- to research, survey and interact with you, for example via email or other communications;
- to develop and improve the Service and player experience;
- to customize your Service experience;
- to provide you our offers in the Service as well as in other websites and services;
- when it is necessary to do as you have requested for sending you related information, security alerts, and support messages;
- to provide social features as part of the Service;
- to moderate chats either automatically or manually;
- to enable you to communicate with other players.

3.2. To show personalized advertisements in the Service as well as in other websites and services (including email); track the content you access in connection with the Service and your online behavior; deliver, target and improve our advertising and the Service.

3.3. We may use the data when processing is necessary for compliance with a legal obligation to which Wefun Studio is subject in order to keep the Service and its social features safe and fair, to fight fraud, prevent crime or cheating and ensure acceptable use otherwise, take action against fraudulent or misbehaving players.

3.4. We may use the data when processing is necessary for the purposes of the legitimate interests pursued by us to analyze, profile, and segment, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child under the relevant age.

In all of the above cases and purposes, we may analyze, profile and segment all collected data (e. g. create reports, analyses or similar for our own research or market purposes, for example to track trends or problems using our Services).

3.5. With your consent.

With your consent, we may process your data for additional purposes, such as using your GPS location to show you local events.

4. Your Personal Data may be shared with third parties

4.1. We may share your information with (i) third parties providers and partners who provide data processing services to us and with whom we have relevant signed agreements, or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information (such as technical support providers, software providers, advertising and marketing partners, professional advisers, consultants (such as solicitors, accountants, tax advisors, auditors and insurance brokers); (ii) public authorities, court, government representative or other third party as necessary in accordance with applicable law and regulations; (iii) to third party when there is a corporate restructuring or sale of assets involving Wefun Studio, or as a result of a change in control of Wefun Studio or affiliate, or to prepare for any of these events. Any third party who is the recipient of such a transfer or sale is authorized to continue using your Personal Data as provided to us, according to this Privacy Policy; or (iv) to any other individuals or entities with your consent to disclosure.

4.2. By accepting this Privacy Policy and downloading or continuing to play our games or use our Services, and unless you opt out of interest-based advertising as explained in Section 11, you consent to us and our advertising partners collecting and using information about you to improve advertising, targeting and measurement systems so that we can show you direct or target interest advertising according to your preferences.

4.3. We do not sell or rent your personal data to any third party.

4.4. By accepting this Privacy Policy and downloading or continuing to play our games or use our Services, you are also authorizing us to, at any time and in our sole discretion, provide third parties with anonymous and statistical data containing no personal data.

5. Playing our games with other players

5.1. In the event you use a third-party social network or platform to access our Services, this third party may provide your personal data to us if you so allow. These websites or applications are created by a third party that is not affiliated with or controlled by Wefun Studio. Please be sure to carefully read their terms of service and privacy policy so that you understand how they use your Personal Data and what might be shared.

5.2. When you allow any interaction between our Services and any social network or platform that belongs to a third party, we also may share your personal data with your contacts for you to enjoy playing with others (your name, your profile avatar and your scores/progress in our games).

5.3. You may, at any time, make changes to the data that these third-party social networks or platforms share with us by changing your settings for that provider, or stop allowing our Services to interact with that provider. In doing so you may not experience our Services' special features to the fullest extent.

6. Storage of Information

6.1. Your personal data will be stored as long as is necessary to provide you with Services or to complete whatever purpose it was originally provided for. But please note even after you have closed your account or have stopped using our Services, we may continue to store your Personal Data if doing so is necessary for us to fulfill our legal obligations.

7. Protection of Information

7.1. We take the security of your Personal Data very seriously. We implement the appropriate technical and physical safeguards to ensure that your Personal Data is protected against accidental or unlawful loss, destruction, alteration, unauthorized access or disclosure, or any other use or unlawful processing of Personal Data you have provided to us. Our security mechanisms for Personal Data are similar to those of other game developers. Please keep in mind, though, that the Internet is not 100% secure and any access, disclosure, alteration or destruction of the Personal Data you have provided through our games due to breach of our safeguards cannot be guaranteed.

8. Links to third parties in our Services

8.1. In our Services and on our website(s), we may embed links to third-party websites. It must be understood that when you click on any of these links, you will be taken to a third-party site and therefore any Personal Data you provide will not be protected under this Privacy Policy, but rather that of the third party. Of course we take great care in selecting reputable links, but we have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

9. International data transfers

9.1. Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal data between our group companies and third party service providers and partners, which require all group companies to protect personal data they process from the EEA in accordance with European Union data protection law. It also includes transferring personal data to third party service providers and partners which are certified under the EU-US and Swiss-US Privacy Shield.

10. Legal Bases for Processing Personal Data

10.1. In each case where we process your Personal Data, we do so lawfully in accordance with one of the legal bases according to the applicable law. The legal bases which we rely upon are the following:

- We need the personal data to perform a contract with you. This applies when data used by us in order to provide you with Services that you have requested – and that we have agreed – to provide to you, such as our games, customer services, chat functionality and third party social network connectivity;

- Legal Obligation. This applies when data used by us to comply with a legal obligation, such as the preventing a crime or fraud or maintaining tax record;
- Legitimate Interests. This applies when data used for analytics, research and optimisation of the Services, and marketing purposes, including direct or target interest based advertising; and
- Consent. This applies when you voluntarily give us specific, informed and unambiguous indication of your wishes by which you signify agreement to the processing of your personal data.

11. Personal Data Protection Rights

If you are in the European Economic Area you have the following data protection rights:

11.1. Right to access your Personal Data.

You have a right to know what Personal Data we hold about you, how and why we handle your Personal Data. You can ask us for a copy of your Personal Data and in some cases to have the information communicated to you. If you would like to exercise your right of access please contact us as described below and let us know what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for, for instance if the information includes personal information about another person. Where we are not able to provide you with information that you have asked for, we will endeavour to tell you why.

11.2. Right to correct or update your Personal Data.

You have a right to request an update or correction to any of your Personal Data which is out of date, incomplete or incorrect.

11.3. Right to delete your Personal Data.

You have a right to ask us to delete your Personal Data which we are holding about you. You can find detailed instructions in Section 14 below. We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. If you would like to ask us for further information on the specific circumstances, and who the other recipients are, and/or exercise your right to erasure please contact us, using the contact details described in Section 12 below. Please note some things can only be deleted when you delete our games from your mobile devices and clear our cookies from any device that you have used for our Services. In that case you will permanently lose all your game progress, Virtual Currency and Virtual Goods without the right to data recovery or refund. When we delete Personal Data about you, we may still retain some or all of that information for other purposes such as maintaining financial records, protecting or enforcing legal rights, maintaining marketing suppression lists or for technical reasons such as maintaining technical security or our database integrity. We may also retain your information in an anonymised form. In some instances, personal information about you that is visible through gameplay such as username, avatar, your high scores and any chat messages may be cached on other players' devices and we may not be able to remove or update that data from those devices, for example if that device is not connected to a network. You can ask us

for further information on the specific circumstances and who the other recipients are, using the contact details described in Section 12 below.

11.4. Right to restriction of processing your personal data.

In certain specific circumstances, you have a right to object to the processing of personal data about you which is processed on the grounds of legitimate interests. You can ask us for further information on the specific circumstances using the contact details described in Section 12 below.

11.5. Right to object at any time to processing of your personal data when processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

11.6. Right to opt-out of direct or target interest advertising on mobile applications by checking the privacy settings on your device settings menu. Please note that even if you use your right to opt-out it you will still receive advertising, but not direct or target interest. On Apple you can opt-out this by going to Settings > Privacy > Advertising and turning on "Limit Ad Tracking". On Android you can opt-out by going to Settings > Google services > Ads and turning on choosing "Opt out of Ads Personalization".

11.7. Right to portability of your personal data. In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller.

11.8. Right to withdraw your consent at any time if we are processing your personal data with your consent.

11.9. Right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

11.10. In some instances, our use of your Personal Data may result in automated decisions being taken (including profiling). Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we use automated decisions to provide direct or targeted interest-based advertising on our Services. You can opt out of direct or targeted interest-based advertising by following the instructions in Section 11.6 above.

12. How to contact us

12.1. Should you have any questions regarding this Privacy Policy or would like to use your Personal Data protection rights described above, please contact us at support@wefunstudio.com

12.2. Should you have a security incident, please contact us at support@wefunstudio.com to report it.

13. Changes of Privacy Policy

13.1 In the event our Privacy Policy is changed or updated, any changes or updates will be posted to keep you aware of the Personal Data that we collect, how it is used and stored, and when we are authorized to disclose it.

13.2. We reserve the right to make any necessary changes to this Privacy Policy at any time, so please view it often.

14. Deletion of Personal Data

Under the General Data Protection Regulation, you have the right to have all of your personal or your children's data used in our application and our partners' services (purchase payments, in-app ad views, etc.) deleted. Please keep in mind that should you decide to delete the data, the user account will be deleted and will not be restorable. However, it will be possible to start the game over from Level 1.

iOS/Android:

1. Go to the in-game Settings in the bottom-right menu
2. Tap **Contact Us** and open the mail window.
3. In the pop-up mail window, write your request to have your personal data deleted, and send it to support@wefunstudio.com
4. Upon receiving your request, Our support team will process it and confirm you the deletion.