

## **Privacy Policy**

When registering, some data are requested that are needed to access the services and play the game. Some data may be, by their nature, personal data pursuant to the Regulation No. 679/2016 (“GDPR”) and so we intend here to provide the information notice according to article 13 of the above Regulation.

### **a) Personal data collected.**

Personal data collected are given voluntarily by the user when registering. We collect the following personal data: username; email address; password; avatar image; nationality; type of operating system, browser and device.

We also collect cookies which are text files containing small amounts of information that are downloaded to your computer or mobile device when you visit a website. Cookies are widely used in order to make websites work, to provide information to the owners of the site and to improve the users’ experience. In particular, we collect:

- technical cookies, that are necessary to operate the website and provide our services as they provide basic functionality such as loading, rendering pages on the Site and enabling your navigation around the website and use of certain features;
- functional cookies, that allow the user to navigate with a set of selected criteria (such as language, text characters, browser type) in order to improve the service rendered;
- analytical cookies, used to collect information, in aggregate and anonymous form, on the number of users and how they use the website, in order to maintain, operate and continually improve the Site.

You can choose to disable technical cookies at any time, but this operation may prevent you from accessing some parts of the Site.

The Site also use technical cookies to keep track of the consent given by the user when this is required, such as the consent for processing of personal data and the consent for the General Terms and Conditions of the Site.

### **b) Identification of the data controller.**

The data controller is Filippo de Grenet , email [fgrenet@dragut.com](mailto:fgrenet@dragut.com)

### **c) Purposes and methods of processing personal data.**

Personal data collected when registering can be used by the data controller for the following purposes:

1. identification and authentication: we use your personal data to verify your identity when you access and use our services and to ensure the security of your personal information;
2. communications: we may use your personal information to contact you;
3. marketing: we may use your personal data to address to you commercial communications about games by the data controller;

4. third party marketing: we may use your personal data to address to you commercial communications by third party authorized by the data controller;
5. statistical purposes: we use your personal data rendered anonymous for non-profiling statistics.

Personal data will be processed with both automated and non-automated means concerning the collection, recording, organization, storage, modification, use of data.

Security measures are taken to ensure that no data is lost or destroyed, only authorized entities may access the data, and no processing is performed either in breach of the law or by departing from the purposes for which the data had been collected initially.

We retain personal information for as long as needed or permitted in light of the purposes for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include the length of time we have an ongoing relationship with you and provide our services to you (i.e., as long as you have an account with us or continue to use the services).

d) Legal bases for processing personal data

The legal bases for processing your personal data are:

- for the purposes described in paragraph c), n. 1 and 2, the necessity for the execution of the services provided by the Site;
- for the purposes described in paragraph c), n. 3 and 4, your freely given consent.

Statistical purposes as indicated in paragraph c), n. 5 are considered compatible with the other purposes according to art. 5.1.b) GDPR.

e) Compulsory or optional provision of data.

The provision of data for the purposes described in paragraph c), n. 1 and 2 is necessary for the execution of the services provided by the Site and therefore failure to provide such data may affect access to, use and provision of services, as well as the quality of the requested services.

The provision of data for the purposes described in paragraph c), n. 3 and 4 is optional and free, and therefore there will be no consequences in case of lack of consent.

f) Categories of entity to whom or which the personal data may be communicated.

The data controller may use employees, members of his staff or processors specifically appointed pursuant to art. 28 GDPR to carry out the activities on his behalf. They would access only to personal data necessary to carry out their duties and they would not use such data for different purposes in accordance with this Information Notice and the current privacy legal dispositions.

With your consent, data controller can communicate your personal data to third parties which sell assets and provide services, including information services, related to videogames and analogical games.

g) User rights.

You can exercise at any moment, pursuant to articles 15-22 GDPR, the following rights:

- to obtain information about the processing;
- to access your personal data;
- to correct personal data if they are inaccurate or incomplete;
- to request the removal or deletion of personal data;
- to receive your personal data provided to the controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller (data portability);
- to object to the processing of personal data where such is done by us in certain circumstances, for example for direct marketing;
- to restrict the processing whether:
  - o the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,
  - o the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
  - o the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
  - o the data subject has objected to processing pursuant to Art. 21.1 GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject;
- to object to a decision making based solely on automated processing, including profiling;
- to withdraw your previously given consent.

You can exercise your right by writing to the email address [fgrenet@dragut.com](mailto:fgrenet@dragut.com).